

CTC Source Protection Region

CTC Source Protection Committee



From:

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January 12, 2025

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| Corporate Services Department Legislative Services Division | |
| Date & Time Received: | January 13, 2026 2:17 pm |
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Subject: CTC Source Protection Committee response to the proposed changes to the *Clean Water Act, 2006*, the *Conservation Authorities Act*, and other relevant legislative and regulatory updates

To: Local and Regional municipal councils across the Credit Valley - Toronto and Region - Central Lake Ontario (CTC) Source Protection Region

The CTC Source Protection Committee in their meeting on December 10, 2025, passed the following resolution #43/25:

THAT the CTC Source Protection Committee receives the staff report entitled "Proposed changes to the Clean Water Act, 2006, the Conservation Authorities Act, and other relevant legislative and regulatory updates", at meeting #6/25 for information.

AND FURTHER THAT the CTC Source Protection Committee endorse the recommendation of this report.

AND FURTHER THAT staff be directed to share this report with the Credit Valley, Toronto and Region, and Central Lake Ontario Source Protection Authorities, CTC Source Protection Region local and regional municipalities, the Ministry of the Environment, Conservation and Parks, the Ontario Provincial Conservation Agency, and the Ministry of Municipal Affairs and Housing.

The report describes the implications for the CTC Source Protection Region drinking water source protection program from **Bill 56** (EROs: 025-1060, 025-1104), **Bill 60** (EROs: 025-1097, 025-0899, 025-0900, 025-0872), **Bill 68** (ERO 025-1257), and provides implementation recommendations. A high-level summary for each Bill is provided in the same order below. The Full report can be found on the [CTC website](#).

Bill 56 (Royal Assent November 3, 2025) includes changes in the *Clean Water Act* and *Safe Drinking Water Act* to speed up the source protection plan amendment process and use of new sources of drinking water, major changes to those source protection plan policies that rely on Prescribed Instruments for implementation (i.e. an instrument under another provincial Act, for example Environmental Compliance Approvals, under the *Environmental Protection Act*). The changes to the approval process are largely in line with municipal needs and recommendations from Source Protection Authority staff across the province. The three Source Protection Authorities in CTC, can accommodate the proposed changes based on current

staffing levels and technical capacity, which should be maintained or improved. There are however operational and implementation challenges that must be addressed quickly to minimize impact to program delivery. For example, further clarification is required on how water quantity considerations are assessed in the new approval process and how the new process may impact existing or upcoming source protection plan amendments. The Ministry of the Environment, Conservation and Parks (MECP), in consultation with source protection authorities and municipalities, must ensure policy gaps are not created because of the proposed changes to Prescribed Instrument policies. Proactive and direct engagement with all relevant stakeholders by the MECP in developing a proposed new Minister's Regulation - outlining standardized conditions and reporting requirements for Prescribed Instruments - will be critical to ensure specific local needs, knowledge, and investments are considered. In CTC, among others, further discussion is required on Lake Ontario (LO-SEW-1 and 2), water quantity (DEM-1 policies).

Changes to the *Planning Act* under **Bill 60 (Royal Assent November 27, 2025)**, provides that a decision of the Minister of Municipal Affairs and Housing, except in the Greenbelt Area, is not required to be consistent with policy statements like policy 4.2.1 of the *Provincial Planning Statement, 2024* to protect all municipal drinking water supplies and designated vulnerable areas. Staff strongly recommend that the Minister should always be required to make decisions that would be consistent with the policy which aims to "*protect all municipal drinking water supplies and designated vulnerable areas.*"

Bill 68 (Royal Assent November 27, 2025) amends the *Conservation Authorities Act* to create the Ontario Provincial Conservation Agency. The Province has also announced plans to consolidate 36 Conservation Authorities into 7 regional conservation authorities. The changes are especially disruptive for the CTC Source Protection Region because its three current Conservation Authorities would be split across three different proposed regional entities. This will require revisions to existing documentation (i.e., local assessment reports, Source Protection Plan), governance (i.e., local Source Protection Authorities, CTC Source Protection Committee, CTC Management Committee), and infrastructure (i.e., software licensing, data ownership and intellectual property, data management processes, agreements, and website design). These changes would contribute little to improving the outcomes of the source protection program and will be disruptive to the ongoing amendments supporting municipal growth.

Furthermore, it is not clear how the proposed seven regional conservation authorities meet the province's selection criteria. In its current form, the proposal will dilute local representation at the source protection authority and source protection committee levels. This will erode local accountability, which will be even more important given the proposed new responsibilities for source protection authorities, introduced by Bill 56, for approving source protection plan amendments. It will also likely diminish local technical knowledge, given the extensive geography, geology, hydrogeology, and biology involved across the proposed regional conservation authorities.

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We note, keeping the source protection regions unchanged under the new regional conservation authority framework would require further legislative and regulatory changes with similarly unanswered questions regarding governance, administration, maintaining meaningful local representation and technical capacity.

The *Clean Water Act, 2006* established a locally driven, science-based, multi-stakeholder process that promotes the shared responsibility of all stakeholders to protect local sources of drinking water from threats to both water quantity and water quality. The Walkerton Inquiry called for drinking water sources to be protected by developing watershed-based source protection plans. Conservation authorities were tasked with leading local source protection efforts in recognition of their technical expertise, experience in watershed-based work, and the ability to facilitate cooperation among local stakeholders. Accordingly, any changes to the program should be done through a locally driven process including direct engagement with all relevant stakeholders. CTC Source Protection Authority staff recommend the province to reconvene the Joint Advisory Committee and leverage the program's robust stakeholder engagement framework to request advice on governance structures that will address provincial objectives while minimizing disruption to the source protection program.

CTC Source Protection Authority staff further recommend that the Province continue to fund conservation authorities to deliver the source protection program without change, while developing a transition plan that minimizes impact to program delivery. This is especially important, because the announced implementation timelines for regionalization of conservation authorities coincide with work planning for the next Drinking Water Source Protection Program Transfer Payment Agreement, due in early 2027 and to be in effect on April 1, 2027. Any and all transitional costs that arise within the source protection program resulting from the consolidation of conservation authorities should be borne by the Province. Finally, the resulting transition plan should include a complete assessment of governance, financial, and operational implications for each source protection region, ensure sufficient staffing and resources for local technical requirements, and provide a transparent assessment of any efficiencies achieved compared with the scope and cost of implementation requirements.

The CTC Source Protection Committee is committed to working collaboratively with all implementing municipalities and the Province to support the continued protection of Ontario's drinking water. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Behnam", is written over a light blue circular stamp.

Behnam Doulatyari, CTC Source Protection Region Program Manager

cc:

Risk Management Officials in CTC Source Protection Region