

DRINKING WATER
SOURCE PROTECTION
Our Actions Matter

CTC Source
Protection
Region

July 3, 2024

The Honourable Lisa Thompson, Ontario Minister of Rural Affairs
The Honourable Rob Flack, Ontario Minister of Agriculture, Food and Agribusiness

(Sent Via e-mail)

Re: Recommended Discontinuation of Private Well Testing Program and Closure of Public Health Laboratories

Dear Minister Thompson and Minister Flack,

The Credit Valley – Toronto and Region – Central Lake Ontario Source Protection Committee (CTCSPC) recently received a letter from the Ausable Bayfield Maitland Valley Source Protection Committee, concerning the recommended elimination of free well water testing by Public Health Ontario.

The 2023 Auditor General Report "Value-for-Money Audit: Public Health Ontario" dated December 2023, provides a recommendation (under Section 4.2.1) that Public Health Ontario, in conjunction with the Ministry of Health, update and implement a plan to streamline public health laboratory operations. Public Health Ontario has recommended the gradual discontinuation of private drinking water testing as part of its January 2023 laboratory modernization plan.

The CTCSPC is concerned about how the proposed changes in well water testing access could affect residents in the CTC Source Protection Region and across Ontario. There are over 100,000 residents in our region and 1.6 million Ontarians (Ontario Auditor General, 2014) who rely on private wells for their drinking water. These private drinking water supplies lack the legislative protection afforded to municipal drinking water supplies through the *Safe Drinking Water Act, 2002* and *Clean Water Act, 2006*.

In consideration of these concerns, at its March 20, 2024 meeting, the CTCSPC requested that a letter supporting Ausable Bayfield Maitland Valley Source Protection Committee's February 26, 2024 letter be sent to you. Please allow this letter to serve as notice the CTCSPC supports and shares the concerns raised by the Ausable Bayfield Maitland Valley Source Protection Committee as outlined in their attached correspondence.

Sincerely,



Nathan Hyde

Chair, Credit Valley – Toronto and Region – Central Lake Ontario Source Protection Committee

- c.c. Honourable Sylvia Jones, Minister of Health
Honourable Andrea Khanjin, Minister of the Environment, Conservation and Parks
Township of Adjala-Tosorontio, Town of Ajax, Township of Amaranth, Town of Aurora, City of Brampton, Municipality of Clarington, Dufferin County, Town of Caledon, Durham Region, Township of East Garafraxa, Town of Erin, Region of Halton, Town of Halton Hills, Township of King, City of Markham, Town of Milton, City of Mississauga, Town of Mono, Town of Oakville, Town of Orangeville, City of Oshawa, Region of Peel, City of Pickering, City of Richmond Hill, Township of Scugog, Simcoe County, City of Toronto, Township of Uxbridge, City of Vaughan, Wellington County, Town of Whitby, Town of Whitchurch-Stouffville, Region of York,
Durham Region Health Department, Halton Public Health Unit, Peel Public Health, Toronto Public Health, Wellington-Dufferin-Guelph Public Health, York Region Public Health

Attachments (1)

Attachment 1: Letter from Chair of Ausable Bayfield Maitland Valley Source Protection Committee to Ontario Minister of Agriculture, Food and Rural Affairs (dated February 26, 2024)

February 26th, 2023

Honourable Lisa Thompson, Ontario Minister of Agriculture, Food and Rural Affairs

Via e-mail: lisa.thompsonco@pc.ola.org

Re: Recommended Phase Out of Free Well Water Testing in the 2023 Auditor General's Report

Dear Minister Thompson,

In the 2023 Auditor General's Value-for-Money Audit of Public Health Ontario (PHO) released in December 2023, recommendation number 5 states that PHO, in conjunction with the Ministry of Health (MOH), are to update and implement a laboratory modernization plan within 12 months to streamline the laboratory's operations.

https://www.auditor.on.ca/en/content/annualreports/arreports/en23/AR_publichealth_en23.pdf

This stemmed from a 2017 proposal by PHO, collaboratively with the MOH at the request of the Deputy Minister to close six of the 11 public health laboratory sites (Hamilton, Kingston, Orillia, Peterborough, Sault Ste. Marie and Timmins) and gradually discontinue private drinking water testing. The justification:

- Mitigating rising costs of maintaining facilities
- Establishing a more efficient operating model that reduces the rerouting of samples to other PHO laboratory sites

About 50% of the Ausable Bayfield Maitland Valley Region population is serviced by private wells. The proposed removal of PHO's free private drinking water testing is of concern to our Ausable Bayfield Source Protection Committee, particularly when Source Protection Regions have been directed by the Ministry of Environment, Conservation and Parks, Source Protection Branch, to deliver education and outreach to private well owners under the new Best Practices initiative.

In our region, we have been working with service and community organizations such as the Lions, Optimists and Lakeshore Residents Associations to co-host very successful Best Practices 'Water Wise' events that encourage private well owners to sample their drinking water using the free microbial testing provided by the province. By distributing water sample bottles ahead of the event and delivering the samples to Huron Perth Public Health for lab analysis, most of

the barriers to water sampling are removed. At these events 25% to 50% of a communities well water will be sampled in one day or night.

Well owners understand the importance of testing their well water; it is the inconvenience of doing so that is the barrier. One of the goals of the 'Water Wise' events is to encourage well owners to get in the habit of testing their water regularly as part of Best Practices for protecting their drinking water. The hope is that the community groups and service clubs that Source Protection staff work with will make Water Wise water sampling events part of their regular activities.

Private drinking water systems in Ontario do not have the legislated safeguards that are required for municipal/communal/public systems under the *Safe Drinking Water Act, 2002*. Only municipal water supply systems fall under the *Clean Water Act, 2006* and the Source Water Protection program. Health Canada's guidance on waterborne pathogens references three studies that determine that private systems are vulnerable and there is evidence that demonstrates they are more likely to contribute to gastrointestinal illness than public drinking water systems.

If the free water testing phase out recommendation is approved, well owners would have to use a commercial lab for a fee, which disincentivizes testing. When water is not monitored regularly, there is no way to know the true quality of the water, which puts people at increased risk of becoming ill. With private systems being stand-alone systems, any associated illnesses are isolated sporadic events and do not come to public attention like those seen during the Walkerton outbreak.

The private drinking water test data maintained by PHO has been used by researchers to publish evidence that helps support public health policy. Source Protection Committees can access data associated with their area, as was presented at our March 2023 meeting. The data can be used to inform well owners of regional water quality concerns and associated health risks. If PHO stops testing, this data and affiliated research will no longer be available.

In the Walkerton Inquiry Report Part 2, Justice O'Connor concluded the privatization of laboratory testing of drinking water samples connected directly to the *E. coli* O157:H7 outbreak in Walkerton Ontario in May 2000. Twenty-four years later, there is a proposal to privatize water testing once again.

At the January 31st meeting of the Ausable Bayfield Maitland Valley Source Protection Committee the following resolution was unanimously approved:

MOTION #SPC: 2024-02-04

Moved by Philip Keightley

Seconded by Mary Ellen Foran

“THAT the Source Protection Committee direct a letter to Minister Thompson requesting that the province not proceed with the recommended phase out of free private well testing in Ontario, and

“FURTHER, THAT area municipalities, the Minister of Environment Conservation and Parks, the Minister of Health and Long-Term Care, other Source Protection Committees, and local health units be forwarded the letter and asked for their support. “

Carried.

Thank you for your consideration of this request.

Sincerely



Matthew Pearson

Chair

Ausable Bayfield Maitland Valley Source Protection Committee

Cc Honourable Sylvia Jones, Minister of Health and Long-Term Care
Honourable Andrea Khanjin, Minister of the Environment, Conservation and Parks

Municipalities of Adelaide Metcalfe, Ashfield-Colborne-Wawanosh, Bluewater, Central Huron, Goderich, Howick, Huron East, Lambton Shores, Lucan Biddulph, Mapleton, Middlesex Centre, Minto, Morris-Turnberry, North Middlesex, North Perth, Perth South, South Bruce, South Huron, Warwick, West Perth, Wellington North
Townships of Huron-Kinloss and North Huron

Huron Perth Public Health, Lambton Public Health, Middlesex-London Health Unit, Wellington Dufferin Guelph Public Health

Source Protection Regions: Cataraqui; Central Lake Ontario, Toronto, Credit Valley; Essex; Hamilton Halton; Grey Sauble, Saugeen, Northern Bruce Peninsula; Lake Erie; Lakehead; Mattagami; Mississippi-Rideau; Niagara; North Bay; Quinte; Raisin South Nation; Sault Ste. Marie; South Georgian Bay Lake Simcoe; Sudbury; Thames -Sydenham and Region; Trent Conservation Coalition