
NIAGARA PENINSULA SOURCE PROTECTION AUTHORITY

Thursday April 16, 2015; 6:30 pm
Ball's Falls Centre for Conservation
3292 Sixth Avenue, Jordan, ON

AGENDA

- **DECLARATION OF CONFLICT OF INTEREST**
 - **ADOPTION OF AGENDA**
 - **BUSINESS:**
 - 1) Approval of Meeting MINUTES – December 17, 2014
 - 2) Business Arising from the Minutes
 - 3) **Report No. SPA-01-15**
Auditor General's Report on the Source Protection Program
 - 4) **Report No SPA-02-15**
Appointment of Niagara Region Representative to Source Protection Committee (SPC)
 - 5) **Report No SPA-03-15**
Recruitment of New Source Protection Committee (SPC) Members – update
 - 6) **Report No SPA-04-15**
Part IV and the Role of the Risk Management Official (RMO)
 - 7) **Report No SPA-05-15**
Annual reporting including Risk Management Official's Report
 - 8) **OTHER BUSINESS**
 - **ADJOURNMENT**
-

Report To: Source Protection Authority (SPA) Board of Directors

Subject: Auditor General's Report on Provincial Source Protection Program

Report No: SPA-01-15

Date: April 16, 2015

RECOMMENDATION:

That the Source Protection Authority receive Report No. SPA-01-15 for information purposes.

PURPOSE:

The purpose of this report is to:

- Provide a summary of the Auditor General's 2014 report concerning the provincial source protection program; and
- High-light important issues discussed by the Auditor General which are pertinent to Niagara's source protection program.

BACKGROUND:

The Source Protection program was initiated in 2005 by the province, in response to the recommendations of Justice O'Connor's enquiry into the Walkerton Drinking Water tragedy. In 2006, the Clean Water Act was passed, which required that source protection plans be prepared for each source protection area or region, to ensure that (municipal) drinking water source are protected. Source Protection is considered the first barrier of a multi-barrier approach to ensuring safe municipal drinking water.

The objective of the Auditor General's (AG's) audit was to assess whether the Ontario Ministry of Environment and Climate Change (MOECC) had effective systems and procedures to:

- Ensure the long-term sustainability of the sources of drinking water in the province; and
- Reduce health risks and potential future costs by effectively managing and protecting drinking water sources in accordance with the related legislation; and
- Reliably measure and report on its performance.

When conducting the audit, AG staff sought information from Source Protection Committee (SPC) Chairs, Conservation Authority (CA) staff, municipalities, Ontario Environmental Commissioner, and key provincial staff. The interviews were conducted in the first half of 2014. The Auditor General's report made 10 recommendations which are provided in Attachment A. Some of the high-lights are discussed below.

DISCUSSION:

In general, the AG report strongly supported the continuation of the Source Protection program across Ontario, and several of the AG's recommendations were concerned with ensuring the long-term sustainability of the program. For instance, the AG report recommended MOECC a strategy to address timely updates of the Source Protection Plans to ensure that policies that eliminate or mitigate the threats to drinking water sources remain current.

The AG report indicated that Source Protection is the first barrier in a multi-barrier approach that should be used to protect our drinking water. It also indicated that preventing the contamination of the sources of drinking water is often easier and less costly than later having to treat the water. To support this comment, the AG report cited some historical cases, including the PCB leak from a storage facility in Smithville.

The AG Report made several recommendations to improve the effectiveness of the Nutrient Management Act (NM Act), so that this legislation could be better used to protect drinking water sources. For instance, the AG Report recommended the province phase in the remaining farms in Ontario that generate or apply nutrients so that all farms must adhere to the requirements of the Nutrient Management Act and its regulations.

The AG Report noted that SPP's do not specifically protect private well supplies, and recommended the MOECC consider extending the program to address private wells. The report noted that many residents who use private wells have no treatment systems and for them, protecting source water is the only barrier of protection against contaminated drinking water.

The AG Report also recommended that the MOECC work with the Ministry of Health and Long-Term Care and local public health units (e.g. Niagara Region Public Health), to put mechanisms in place to notify private well owners when bacterial and chemical levels are known to exceed acceptable levels in their area.

RELATED REPORTS AND APPENDICES

1. Attachment A, The Auditor General's 10 recommendations on Source Water Protection.
2. Auditor General's Report, Chapter 3, Section 3.12 Source Water Protection, Ministry of the Environment and Climate Change. Web link;

http://www.auditor.on.ca/en/reports_en/en14/312en14.pdf

Prepared by:



Brian Wright; Manager, Watershed Projects

Reviewed by:



Peter Graham P.Eng.; Director, Watershed

Submitted by:



Carmen D'Angelo; CAO/Secretary Treasurer

ATTACHMENT "A"

The Auditor General's 10 recommendations are noted below.

1. To ensure that source water protection plans are reviewed, approved and implemented in a timely manner, the Ministry of the Environment and Climate Change should:
 - internally set a firm commitment of when plans should be approved and then review its current staffing of the key personnel responsible for reviewing and approving plans to ensure it is sufficient to meet the commitment;
 - work with Source Protection Committees to ensure that outstanding water budget studies are completed and submitted as soon as possible; and
 - in consultation with municipalities and Conservation Authorities, devise an approach to fund the implementation of many of the policies within the plans once the plans are approved.
2. In the longer term, the Ministry of the Environment and Climate Change, in conjunction with Source Protection Committees, should develop a strategy that addresses timely updates of the plans to ensure that local threats to source water, and policies that eliminate or mitigate the threats, remain current.
3. To strengthen source water protection and better ensure all significant threats are identified and addressed, the Ministry of the Environment and Climate Change should ensure that the data and assumptions used in its framework for assessing the significance of threats to drinking water intakes in the various regions of the province are current and properly enable significant threats to be classified as such.
4. To ensure that source water protection plans address all potential threats to drinking water intakes in the Great Lakes, the Ministry of the Environment and Climate Change should work with the relevant Conservation Authorities and Source Protection Committees to complete an inventory of all conditions and near-shore activities that pose a threat to the intakes, assess the conditions, and incorporate into the protection plans ways of dealing with these threats.
5. To strengthen source water protection, the Ministry of the Environment and Climate Change should consider the feasibility of requiring source protection plans to identify and address threats to sources of water that supply private wells and intakes and threats that abandoned wells may pose to sources of groundwater. As well, in conjunction with the Ministry of Health and Long-Term Care and public health units, the Ministry should put mechanisms in place to notify private well owners when bacterial and chemical levels are known to exceed acceptable levels in their area.
6. To better ensure that any future funding to municipalities for the implementation of source protection plans is allocated fairly to achieve intended objectives, the

Ministry of the Environment and Climate Change should ensure all eligible municipalities are identified before distributing funds.

7. To better ensure that the objectives of the *Nutrient Management Act* are being met, the Ministry of the Environment and Climate Change, together with the Ministry of Agriculture, Food and Rural Affairs, should develop an approach to gather information on the total number of farms in the province that need to manage nutrients in accordance with the *Nutrient Management Act* and its regulations.
8. The Ministry of the Environment and Climate Change, in conjunction with the Ministry of Agriculture, Food and Rural Affairs, should phase in the remaining farms in Ontario that generate or apply nutrients so that they also must adhere to the requirements of the *Nutrient Management Act* and its regulations.
9. To better ensure that the *Nutrient Management Act* and its regulations are being enforced, the Ministry of the Environment and Climate Change should:
 - set appropriate inspection targets that fully utilize inspection staff and maximize the number of inspections being performed;
 - use appropriate risk-based criteria to select farms for inspection; and
 - follow up on any noted cases of non-compliance and encourage compliance by using, where necessary, all available punitive measures, such as offence notices.
10. To ensure the Ministry of the Environment and Climate Change will be able to recover the province's cost of administering its water quantity management programs, and to ensure the sustainability of sources of water in the province, the Ministry should:
 - charge industrial and commercial users of either surface or groundwater sources in Ontario an appropriate fee; and
 - refer to the relevant water budget studies prepared by Conservation Authorities when deciding to issue water-taking permits.

Report To: Source Protection Authority (SPA) Board of Directors

Subject: SPC Member Appointment

Report No: SPA 02-15

Date: April 16, 2015

RECOMMENDATION:

That the Source Protection Authority appoints Councillor Paul Grenier to represent Niagara Region and the twelve local municipalities within Niagara Region, on the Source Protection Committee.

PURPOSE:

Appoint Regional Councillor Paul Grenier to the Niagara Peninsula Source Protection Committee.

BACKGROUND:

The attached letter was sent to Niagara Region requesting a new representative be designated for the Source Protection Committee. Regional Councillor Paul Grenier of Welland has been designated by Niagara Region as the new representative. Mr. Grenier's appointment is for a term of three years as prescribed in the Clean Water Act and regulations but may be extended to better match the municipal electoral office terms. The Niagara Region resolution is attached.

RELATED REPORTS AND APPENDICES:

1. Letter to Niagara Region concerning the selection of a candidate for the Source Protection Committee
2. Resolution from Niagara Regional Council.

Prepared by:


Brian Wright; Manager, Watershed Projects

Reviewed by:


Peter Graham P.Eng.; Director, Watershed

Submitted by:


Carmen D'Angelo; CAO/Secretary Treasurer



**NIAGARA PENINSULA
CONSERVATION
AUTHORITY**

250 Thorold Road West, 3rd Floor, Welland, Ontario L3C 3W2
Telephone 905.788.3135 Facsimile 905.788.1121 www.niagara.ca

February 26, 2015.

Attention: Mr. Ralph Walton
Office of the Regional Clerk
Niagara Region
2201 St. David's Rd., P.O. Box 1042
Thorold, ON L2V 4T7
Tel: 905-980-6000 Ext. 3222

Dear Mr. Walton:

Subject: Designating a new representative for the Niagara Peninsula Source Protection Committee

We wish to inform you that Niagara Peninsula Source Protection Authority is seeking a new designated representative for the Niagara Peninsula Source Protection Committee (SPC). The designated person will represent Niagara Region and the 12 local municipalities.

One of the requirements under the Clean Water Act and its associated regulations is that a SPC member may not currently be a member of the Conservation Authority Board of Directors. Thus, with the recent appointment of Regional Councillor Diodati to the Niagara Peninsula Conservation Authority Board of Directors in January 2015, we are seeking to fill this vacancy on the SPC. We wish to thank Mr. Diodati for his interest in the Source Protection program in Niagara. Ensuring safe reliable drinking water is vital to the health and well-being of residents of Niagara, and also important for a prosperous economy.

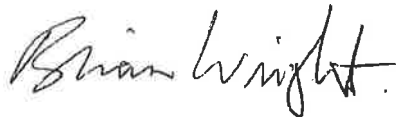
We request that Regional Municipality of Niagara coordinate the selection of the SPC representative. The SPC representative can be a municipal councillor or an appropriate municipal staff member. For instance, a senior staff member represents the City of Hamilton on the SPC. Once a person has been selected, the Source Protection Authority will then appoint the newly designated representative to the SPC.

A summary of the obligations and requirements of SPC members is attached along with some descriptions of the SPC and its role. Please note that the SPC is expected to meet only once or twice per year. All new SPC members will need to participate in a training and orientation session in order to fulfil their duties on the SPC. More information can be found at our source protection website at:

<http://www.sourceprotection-niagara.ca/>

Authority staff is available to provide additional information, or where appropriate, help coordinate the selection process. If you have any questions or comments, or require additional information, please do not hesitate to contact us.

Yours truly,

A handwritten signature in black ink that reads "Brian Wright". The signature is written in a cursive, flowing style.

Brian Wright, MBA, P.Eng.
Manager, Watershed Projects

E-Copy: Mark Neufeld, Chair, Niagara Peninsula Source Protection Committee
Brian Baty, SPA Liaison to Niagara Peninsula SPC
Carmen D'Angelo, CAO, NPCA
Peter Graham, Director, Watershed Management, NPCA
D. Bruce Timms, Chair, NPCA
Deanna Barrow, Manager of Quality & Compliance, Water, Niagara Region

Encl.: -Description of the SPC, and Obligations and Requirements of SPC Members
-Code of Conduct and Conflict of Interest Policy for Members of the Niagara Peninsula Source Protection Committee

Description of the SPC and Obligations and Requirements of SPC Members

Summary of Functions of the Source Protection Committee (SPC):

The Source Protection Committee (SPC) was responsible for overseeing the development of a Source Protection Plan (SPP) to protect municipal sources of drinking water in the Niagara Peninsula Source Protection Area. In December 2013, the SPP was approved by the provincial government. Consequently the role of the Committee has changed. During the SPP implementation phase, the Committee is expected to review the annual monitoring reports from implementing bodies as well as oversee any updates to the SPP and Assessment Report. The Committee, by regulation, consists of 9 members plus a Chair, who is appointed by the provincial government.

Summary of Committee Member Obligations and Requirements

The obligations of the Source Protection Committee members are as follows:

- Make a three year commitment to participate;
- Regularly attend committee meetings (about one or two per year);
- Attend training sessions;
- Reside, own property, rent property, be employed in, operate a business in, or be employed by a municipality that is located within the boundaries of Niagara Peninsula Source Protection Area;
- Cannot be a current Conservation Authority Board or staff member;
- Respect confidential information and abide by the process in place to safeguard confidential information;
- Comply with the committee's code of conduct;
- Act as liaison by bringing forward common concerns from knowledge and experience of respective sector to the committee;
- Work together with representatives from other sectors;
- Provide input and make decisions at the committee table;
- Understand source protection science concepts and technical reports;
- Review reports/documents as required.

Committee Composition

The Niagara Peninsula Source Protection Committee is comprised of three sectors, with each sector having one third of the members. The three sectors and number of representatives per sector as prescribed in the regulation are shown below.

Municipal Sector – 3 representatives

Economic Sector – 3 representatives

Other Public Interests – 3 representatives

Selection of Municipal SPC Members

Three committee members represent the municipalities that lie (in whole or in part) within the Source Protection Authority. As per the regulations, the Source Protection Authority has divided the municipalities into the following three groups by area as shown below, for the purposes of selecting the municipal SPC members.

Group 1: 1 representative - City of Hamilton

Group 2: 1 representative - Haldimand County

Group 3: 1 representative - Regional Municipality of Niagara, on behalf of the Region, Town of Grimsby, Town of Lincoln, City of Welland, City of Niagara Falls, City of Thorold, City of St. Catharines, Town of Fort Erie, Township of Wainfleet, Town of Niagara-On-The-Lake, City of Port Colborne, Town of Pelham, Township of West Lincoln.

During the formation of the SPC in 2007, Regional Municipality of Niagara coordinated the selection of the appointee for Group 3, and advised the Niagara Peninsula Source Protection Authority of its recommended representative to the Source Protection Committee.

**Code of Conduct and Conflict of Interest Policy
for Members of the
Niagara Peninsula Source Protection Committee**

1.0 Preamble

- 1.1 Source protection committees established by source protection authorities under section 7 of the *Clean Water Act, 2006* are responsible for the preparation of terms of references, assessment reports and source protection plans for source protection areas in accordance with the Act, regulations and Director's rules.
- 1.2 Members of a Committee bring to the committee a wide range of relevant knowledge and expertise relating to the committee's role, acquired as a result of experience in both the private and public sector. Committee Members join the committee to contribute to the source protection planning process under the *Clean Water Act, 2006*.
- 1.3 The purpose of this Code of Conduct and Conflict of Interest Policy is to set out the standard of conduct expected of Members of Committees appointed by source protection authorities. It also sets out the procedure to be followed by Members in disclosing conflicts and perceived conflicts, as well as the consequences of failure to comply with that procedure.

2.0 Definitions

- 2.1 For the purposes of this Code, the following definitions apply:
 - 2.1.1 **"Code"** means this Code of Conduct and Conflict of Interest Policy;
 - 2.1.2 **"Commercial Information"** means information that relates solely to the buying, selling or exchange of merchandise or services by both profit-making enterprises and non-profit organizations;
 - 2.1.3 **"Committee"** means a source protection committee established by a source protection authority under section 7 of the *Clean Water Act, 2006*.
 - 2.1.4 **"Confidential Information"** means Commercial Information, information about a third party, material information about a pending government decision or announcement or any other information that is not in the public domain regardless of whether it is identified as confidential that is obtained by the Member in the course of serving on the Committee. For example, particular care

should be exercised in releasing information relating to the following matters:

- personal information about any individual
- items under litigation
- personnel matters
- information about suppliers provided for evaluation which might be useful to competitors
- sources of complaints about a variety of matters where the identity of the complainant is given in confidence
- items under negotiation
- information supplied in support of license applications, etc., where such information is not part of the public documentation
- schedule of prices in contract tenders
- personal opinions regarding policies, regulations and programs should not be given to the public.

The preceding is not an exclusive list.

2.1.5 **“Gift”** includes any money, thing, intangible or personal benefit exceeding \$100.00 in value or anything that may reasonably be seen to compromise the personal judgement or integrity of a Member, but does not include nominal gifts, gratuities, hospitality or favours that do not create a sense of business obligation to the giver;

2.1.6 **Harassment** may include, but is not limited to the following:

(a) Sexual Harassment

- unwelcome remarks, jokes, and innuendos or taunting about a person's body, attire, sexual orientation or gender;
- practical jokes of a sexual nature which cause awkwardness or embarrassment;
- displaying pornographic pictures or other offensive material;
- leering (suggestive staring) or other gestures;
- unnecessary physical contact such as touching, patting or pinching;
- physical assault;
- demands for sexual favours or repeated unwanted social invitations

(b) Racial or Ethnic Harassment

- unwelcome remarks, jokes, innuendos or taunting about a person's racial or ethnic background, colour, place of birth, citizenship or ancestry;
- the displaying of derogatory or offensive racist pictures or material;

- refusing to converse or work with an Member or volunteer because of his or her racial or ethnic background;
- insulting gestures or practical jokes based on racial or ethnic grounds, which cause embarrassment or awkwardness;

(c) Other Harassment

- unwelcome remarks jokes, innuendo or taunting about a person's age, record of offenses, marital status, family status, handicap or creed.

2.1.7 **“Member”** means a member of a Committee appointed by the Minister or a source protection authority under section 7 of the *Clean Water Act, 2006*

2.1.8 **“Private Interest”** includes the financial or material interests of a Member and the financial or material interests of a Member of the Member’s immediate family;

2.1.9 **“Prohibited Activities”** means:

2.1.9.1 Seeking or accepting a Gift in connection with their capacity as Member;

2.1.9.2 Attempting to influence committee decisions in order to further the Member’s Private Interest or the interests of a third party, including participating in a matter before the Committee, or making representations to another Member about a recommendation or decision that the Member should make and, at the same time, knowing or ought to know that in the recommendation or decision is the opportunity, or the reasonable appearance of an opportunity, for the Member to further his or her own Private Interest;

2.1.9.3 Using Confidential Information for any improper purpose, which includes using Confidential Information to the benefit of the Member’s Private Interest;

2.1.9.4 Disclosing Confidential Information to third parties without the consent of party to whom the information relates;

2.1.9.5 Taking an action in their capacity as a Member that involves dealing with oneself in a private capacity that confers a benefit on oneself;

2.1.9.6 Misrepresenting their role as a Member to a third party to further the Member’s Private Interest;

2.1.9.7 Holding oneself out as an official of the Government of Ontario or inferring to a third party that the Member has the capacity to deliver a favourable decision from the government,

2.1.9.8 Making representations to a third party that the Government of Ontario has endorsed the business activity that the Member is engaged in;

2.1.9.9 Using the name Government of Ontario or Ministry of the Environment for personal purposes or to further the Member's Private Interest; and

2.1.9.10 Failing to disclose a Conflict of Interest to the Chair or Minister as the case may be.

3.0 Conflict of Interest

3.1 A conflict of interest refers to a situation in which the Private Interests or personal considerations of the Member could compromise, or could reasonably appear to compromise, the Member's judgment in acting objectively and in the best interest of the Committee. It is important to note that a conflict of interest exists if the decision could be, or could appear to be compromised. It is not necessary that compromise takes place.

3.2 A conflict of interest also includes using a Member's position or Confidential Information for private gain or advancement or the expectation of private gain or advancement (e.g. direct or indirect financial interest in a matter, a contract or proposed contract with the SPC or its agent, the Lead SPA). A conflict may occur when an interest benefits any member of the Member's family (spouse, partner, children, parents, siblings), friends or business associates.

3.3 Members should not engage in private employment or render services for any person or corporation where such employment or services are considered a conflict of interest as defined by the Province of Ontario Conflict of Interest legislation. Where an Member is or becomes involved in such private employment, the Member must resign from the Committee.

4.0 Application and Scope

This Code applies to all persons appointed to a Committee under section 7 of the *Clean Water Act, 2006*.

5.0 Principles and Code of Conduct

5.1 Members of the Committee are expected to:

- 5.1.1 Conduct themselves ethically, lawfully and with integrity;
- 5.1.2 Act in the public interest, serving the mandate of the Committee as a whole, rather than serving the Member's Private Interest or other interests;
- 5.1.3 Maintain a sense of fairness, independence and objectivity and treat others with respect;
- 5.1.4 Refrain from placing themselves in Conflict of Interest situations;
- 5.1.5 Disclose any actual, potential or perceived Conflict of Interest to the Chair of the committee and to the Chair of the source protection authority or where the Chair is reporting, to the Minister and the Chair of the source protection authority.
- 5.1.6 Refrain from engaging in any of the Prohibited Activities as described in this policy;
- 5.1.7 Educate other Members on those matters within their own area of expertise with a goal of having the Committee make decisions collectively;
- 5.1.8 Demonstrate their commitment to the Committee and to the source protection planning process through high levels of attendance and participation at committee meetings.
- 5.1.9 Every Member of the Committee, the staff or consultants are entitled to work in an environment that is free from discrimination and/or harassment. The Chair will take prompt and appropriate action to prevent, discourage or respond to incidents of discrimination or harassment. Every Member, staff or consultant of the Committee will deal with their fellows in a fair and equitable manner free from discrimination and/or harassment.

A Member or volunteer who feels they are being harassed at work should:

- make it clearly known to the offender that their conduct is unacceptable and should not be repeated; and/or
- discuss the situation, in confidence, with the Chair or Project Manager;
- keep a short written record of dates, incidents and names of witnesses, if any;
- if necessary, prepare a written complaint.

Upon receipt of a verbal or written complaint, the Chair or Project Manager will conduct an investigation in confidence. If the investigation concludes that harassment has occurred, appropriate disciplinary action will be taken (this may include suspension or termination). If the investigation concludes that the complaint is unfounded the complaint and investigation file will be destroyed. The Member or staff who issued the complaint will be informed of the results of the investigation and of any action taken

5.2 Confidential Information

Members have access to confidential information by reason of their participation on the Source Protection Committee. Members must not make such information available unless it is public information. Where a Member is unsure of the status of information, before making any release h/she shall discuss it with the Department Manager who may see fit to consult with the Project manager.

5.3 Only the Chair or the Project Manager or his/her designate should comment to the media on policy matters. This policy is not intended to restrict the ability of Members to express an opinion on non-Committee general interest matters, where the Member makes it clear that he/she is commenting as a private citizen and not in his capacity as a SPP Member.

5.4 All Members appointed to a Committee by a source protection authority have an obligation to raise any concern with the Chair with respect to their compliance with this Code. The Chair will determine an appropriate response and communicate this to the Member.

5.5 A chair of a Committee has an obligation to raise any concern with the Minister and the Chair of the source protection authority with respect to their compliance with this Code. The Minister will determine an appropriate response and communicate this to the Chair and the Chair of the source protection authority.

6.0 Procedure for Disclosing a Conflict of Interest

6.1 A Member who has reasonable grounds to believe that he or she may have a Conflict of Interest or that there may be an appearance of a conflict of interest, in respect of a matter that is before the Committee shall:

6.1.1 Promptly disclose (verbally or in writing) the actual, potential or perceived Conflict of Interest to the Chair or where the Member is the Chair, promptly disclose the Conflict of Interest to the Vice-Chair or if there is no Vice-Chair, to the Committee; and

6.1.2 Excuse him or herself from the Committee meeting while the matter is under consideration. If the Member is participating via

telephone or other electronic means, the Chair shall ensure that the Member is not able to listen to or participate in the discussion of the matter.

- 6.2 A Member who has disclosed an actual, potential or perceived Conflict of Interest to the Chair or the Vice-Chair or the Committee, as the case may be, shall refrain from voting or participating in the consideration of the matter, or from commenting on, discussing or attempting to exert his or her personal influence on another Member with respect to the matter.
- 6.3 The minutes of the meeting shall reflect the disclosure of the actual, potential or perceived Conflict of Interest and whether the Member withdrew from the discussion of the matter.
- 6.4 If it is not entirely clear whether or not an actual, potential or perceived Conflict of Interest exists, then the Member with the potential Conflict of Interest shall disclose the circumstances to the Chair and the Chair of the source protection authority or the Minister and the Chair of the source protection authority as the case may be.
- 6.5 The Chair or the Minister, as the case may be, will determine if there is a Conflict of Interest or if the Member's conduct has violated this policy, in a timely fashion, dependent on the complexity of the situations and will communicate his or her decision directly to the Member.
- 6.6 A Member who has concerns about the conduct of another Member regarding compliance with this Code should raise those concerns with the Chair. The Chair will follow essentially the same process for addressing complaints as for dealing with declared Conflicts of Interest with modifications to suit the different circumstances.
- 6.7 A Member who has concerns about the conduct of the Chair regarding compliance with this Code should raise those concerns with the Minister. The Minister will follow essentially the same process for addressing complaints as for dealing with declared Conflicts of Interest by the Chair with modifications to suit the different circumstances.
- 6.8 All correspondence between the Chair and the Minister respecting the disclosure of a Conflict of Interest shall be treated as personal information under the *Freedom of Information and Protection of Privacy Act*.

7.0 Procedure where Member has engaged in Prohibited Activities

- 7.1 Where a Member, other than the Chair, has engaged in a Prohibited Activity, the Chair may:

- 7.1.1 Request the source protection authority to investigate the matter and report to the Chair with his or her findings or recommendations;
 - 7.1.2 Request that the Member refrain from participating as a Member of the Committee pending the outcome of the investigation;
 - 7.1.3 Request that the Member resign from the Committee;
 - 7.1.4 Request that the source protection authority revoke the Member's appointment in accordance with O. Reg. XXX/07 (Source Protection Committees).
- 7.2 Where the Chair has engaged in a Prohibited Activity, the Minister may:
- 7.2.1 Request the source protection authority to investigate the matter and report to the Minister with its findings or recommendations;
 - 7.2.2 Request that the Chair refrain from participating as a Member of the Committee pending the outcome of the investigation;
 - 7.2.3 Request that the Chair resign from the Committee;
 - 7.2.4 Take steps to revoke the Chair's appointment.

8.0 Acknowledgement

- 8.1 Each Member shall be required to review a copy of this Code and acknowledge in writing that he or she has done so.
- 8.2 The source protection authority will retain a copy of each Member's signed acknowledgement.

Acknowledgement

I, _____, a Member of the source protection committee for the Niagara Peninsula source protection area, hereby acknowledge that I have reviewed the Code of Conduct and Conflict of Interest Policy for Members of Source Protection Committee, dated _____ and further acknowledge that I understand that it is a condition of my appointment to the source protection committee that I will comply with the Code of Conduct and Conflict of Interest policy.

Date: _____

Witness: _____

Signature : _____

Name: _____

Name : _____

Administration

Office of the Regional Clerk

2201 St. David's Road, PO Box 1042, Thorold, ON L2V 4T7

Telephone: 905-685-4225 Toll-free: 1-800-263-7215 Fax: 905-687-4977

www.niagararegion.ca

March 27, 2015

CL 6-2015 March 26, 2015

Our Reference: C8262

Mr. Brian Wright, MBA, P.Eng.
Manager, Watershed Projects
Niagara Peninsula Conservation Authority
250 Thorold Road West; 3rd Floor
Welland, ON L3C 3W2

Re: Designating a new representative for the Niagara Peninsula Source Protection Committee

Dear Mr. Wright:

Regional Council at their meeting on Thursday, March 26, 2014 approved the following motion:

That Correspondence Item C8262 being a letter from B. Wright, Manager, Watershed Projects, Niagara Peninsula Conservation Authority, dated February 26, 2015, respecting Designating a New Representative for the Niagara Peninsula Source Protection Committee, **BE RECEIVED**; and

That Councillor Grenier **BE APPOINTED** as Regional Council's representative on the Niagara Peninsula Source Protection Committee for the remainder of this term of Council, effective immediately.

Councillor Grenier's contact information is:

Paul Grenier
69 Queen Street
Welland , Ontario L3C 1S1
905-788-2624 (Residence)
905-380-4787 (Cell)
paul.grenier@niagararegion.ca
jpaulgrenier@gmail.com

Yours truly,



Natasha Devos
Deputy Regional Clerk
/pp

Report To: Source Protection Authority (SPA) Board of Directors

Subject: SPC Member Recruitment

Report No: SPA 03-15

Date: April 16, 2015

RECOMMENDATION:

That the Source Protection Authority receive Report No. SPA-03-15 for information purposes.

PURPOSE:

To update the Source Protection Authority on the recruitment of two new Source Protection Committee members.

BACKGROUND:

Niagara Peninsula Source Protection Authority is currently seeking two new representatives to serve on the Niagara Peninsula Source Protection Committee SPC. These representatives would include one member from the public-at-large and a second member from the commercial or tourism sector in Niagara.

As prescribed in Ontario Regulation 288/07, the new representatives will be required to meet the following obligations and requirements in order to be considered for appointment to the SPC.

- Make a three year commitment to participate;
- Regularly attend committee meetings (about two meetings per year);
- Attend training and orientation session as required;
- Must reside, own property, rent property, be employed in, operate a business in, or be employed by a municipality that is located within the boundaries of the Niagara Peninsula Source Protection Area;
- Cannot be a current Conservation Authority Board or staff member;
- Respect confidential information and abide by the process in place to safeguard confidential information;
- Comply with the committee's code of conduct;
- Act as liaison by bringing forward common concerns from knowledge and experience of respective sector to the committee;
- Work together with representatives from other sectors;
- Provide input and make decisions at the committee table;
- Understand source protection science concepts and technical reports; Review reports/documents as required.

Notices are being placed in the local newspapers and posted on the Niagara Peninsula Source Water Protection website.

Prepared by:



Brian Wright; Manager, Watershed Projects

Reviewed by:



Peter Graham P.Eng.; Director, Watershed

Submitted by:



Carmen D'Angelo; CAO/Secretary Treasurer

Report To: Source Protection Authority (SPA) Board of Directors

Subject: Part IV and the Role of the Risk Management Official

Report No: SPA 04-15

Date: April 16, 2015

RECOMMENDATION:

That the Source Protection Authority receive Report No. SPA 04-15 for information purposes.

PURPOSE:

The purpose of this report is to:

- Provide some background on Part IV of the Clean Water Act and the Role of Risk Management Officials (RMOs);
- Provide information on Niagara Region's RMO responsibilities;
- Present the provincial document designating RMOs as Provincial Officers.

BACKGROUND:

The Clean Water Act was passed in 2006, in response to some of the recommendations from Justice O'Connor's inquiry into the Walkerton drinking water tragedy where 7 people died and more than 2300 became ill. The purpose of the Clean Water Act is to protect our (municipal) drinking water sources. Source protection is considered one of several barriers that should be used to protect our drinking water.

The Act requires that local source protection plans be prepared for each source protection area or region, to ensure that (municipal) drinking water sources are protected now and in future. As recommended by Justice O'Connor, the source protection areas and regions are delineated by the watershed boundaries and not the municipal boundaries. The source protection plans were developed locally under the direction of local source protection committees, of which there are 19 across the province (attached figure).

The Niagara Peninsula Source Protection Committee was responsible for developing a source protection plan (SPP) in Niagara Peninsula Source Protection Area (which has the same boundary as the Niagara Peninsula Conservation Authority. The SPP for Niagara was submitted to the province and approved by the Minister of the Environment in 2013. The development of the SPP included an extensive public consultation process to ensure the policies it contains are reasonable and implementable while still protecting our drinking water.

The plan uses a number of legal instruments and legislated powers besides the Clean Water Act. For instance, the Planning Act, Environmental Protection Act, Nutrient Management Act, and MOECC Environmental Compliance Approval process (formerly known as the Certificate of

Approval process), can all be used in the source protection plans to prohibit or manage threats to our drinking water sources. However, Part IV of the Clean Water Act contains additional special municipal powers that can be used to manage or prohibit certain land use activities where they are significant drinking water threats.

NIAGARA PENINSULA SPP POLICIES THAT USE PART IV OF THE CLEAN WATER ACT

The Niagara Peninsula SPP contains a number of policies that use these Part IV powers as shown below.

Part IV Powers Used in Niagara Peninsula SPP

Policy	Area	Drinking Water Threat Activity	Policy
DC-4, DC-5	Decew Falls IPZ-1s	-Application of Agricultural Source Material (ASM) to land; -Storage of ASM; -Livestock grazing and pasturing; farm animal yards; and -outdoor confinement areas.	Risk Management Plan (RMP)
PC-5, PC-6	Port Colborne IPZ-1	Storage of pesticides in quantities greater than 2,500 kg.	RMP
PC-25, PC-26	Port Colborne IPZ-1 & 2	Application of pesticide in commercial quantities	RMP
PC-13	Port Colborne IPZ-1	Storm water runoff containing aircraft de-icing chemicals	Prohibition

As prescribed in the Clean Water Act, it is the responsibility of the municipality to implement these Part IV policies. The Act requires that the municipality designate a Risk Management Inspector (RMI) and Risk Management Official (RMO) who will ensure that Risk Management Plans are developed when required by the SPP policy.

Specifically, Section 47(1) of the Clean Water Act states,

- “47. (1) Except where otherwise provided,
- (a) the council of a single-tier municipality is responsible for the enforcement of this Part in the municipality; and
 - (b) the council of an upper-tier municipality or lower-tier municipality that has authority to pass by-laws respecting water production, treatment and storage under the *Municipal Act, 2001* is responsible for the enforcement of this Part in the municipality.”

where “Part” refers to Part IV of the Clean Water Act which covers RMI and RMO responsibilities. The “except as otherwise provided” is covered by Section 48 of the Act which states,

- “48. (1) The council of a municipality referred to in subsection 47 (1) and a board of health, planning board or source protection authority may enter into an agreement for the enforcement of this Part by the board of health, planning board or source protection authority in the municipality with respect to activities identified in the agreement, and for charging the municipality the whole or part of the cost.”

Niagara Region established a Risk Management Official under the Act in 2012. Niagara Region’s RMI/RMO is responsible for ensuring that Risk Management Plans are developed by landowners and businesses who are engaged in these significant drinking water threat

activities. The Niagara Region RMO has also been integrated into the planning department screening processes of Niagara Region and the local municipalities to ensure the SPP policies are adhered to.

The Clean Water Act does allow for municipalities to contract out their RMI/RMO responsibilities to the local Conservation Authority (Section 48 of the Act as shown above). Attachment 2 shows how the RMI/RMO responsibilities have been handled by the municipalities across the province. The map shows some distinctive but consistent trends:

- All the larger cities and upper tier Regional municipalities have kept the RMI/RMO responsibilities in-house (i.e. Regions of Niagara, Halton, York, Durham, and Waterloo, as well as City of Hamilton, City of Ottawa, and City of Guelph all retained this responsibility); while
- The small single tier rural municipalities that cannot afford to hire new staff to fill the RMO position have tended to contract the responsibility out (mostly to the Conservation Authorities that would then retain one staff to service several municipalities).
- A few of the County councils remain undecided or blind to their upcoming obligations.

The last By-law designating the RMO for Niagara Region is attached.

DESIGNATING RMO-CONSERVATION AUTHORITY STAFF AS PROVINCIAL OFFICERS

The legislation designates municipal RMIs and RMOs as provincial officers so they will have the legal authority to carry out their duties. However, the legislation was not completely clear when the RMI and RMO positions were contracted to Conservation Authorities. This potential discrepancy was rectified through the attached documents. Since the NPCA has not been delegated the RMI/RMO responsibilities from Niagara Region, this document does not apply to NPCA.

RELATED REPORTS AND APPENDICES:

1. Figure of Source Protection Areas and Regions
2. Figures showing RMO responsibilities across the province
3. Niagara Region By-Law designating the RMO.
4. MOECC Memo to SPA's concerning Provincial Officer designation
5. Provincial Officer designation - document

Prepared by:


Brian Wright; Manager, Watershed Projects

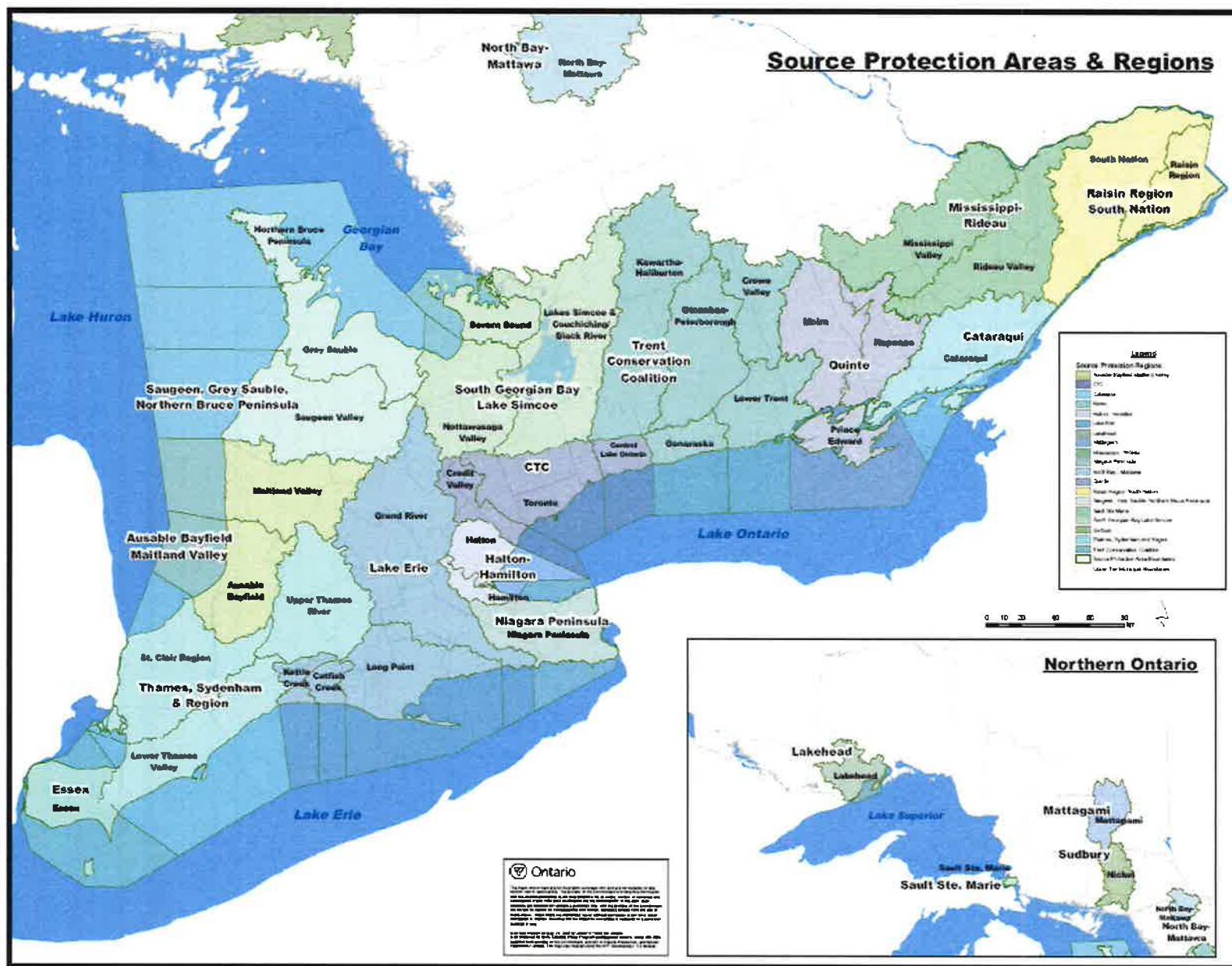
Reviewed by:


Peter Graham P.Eng.; Director, Watershed

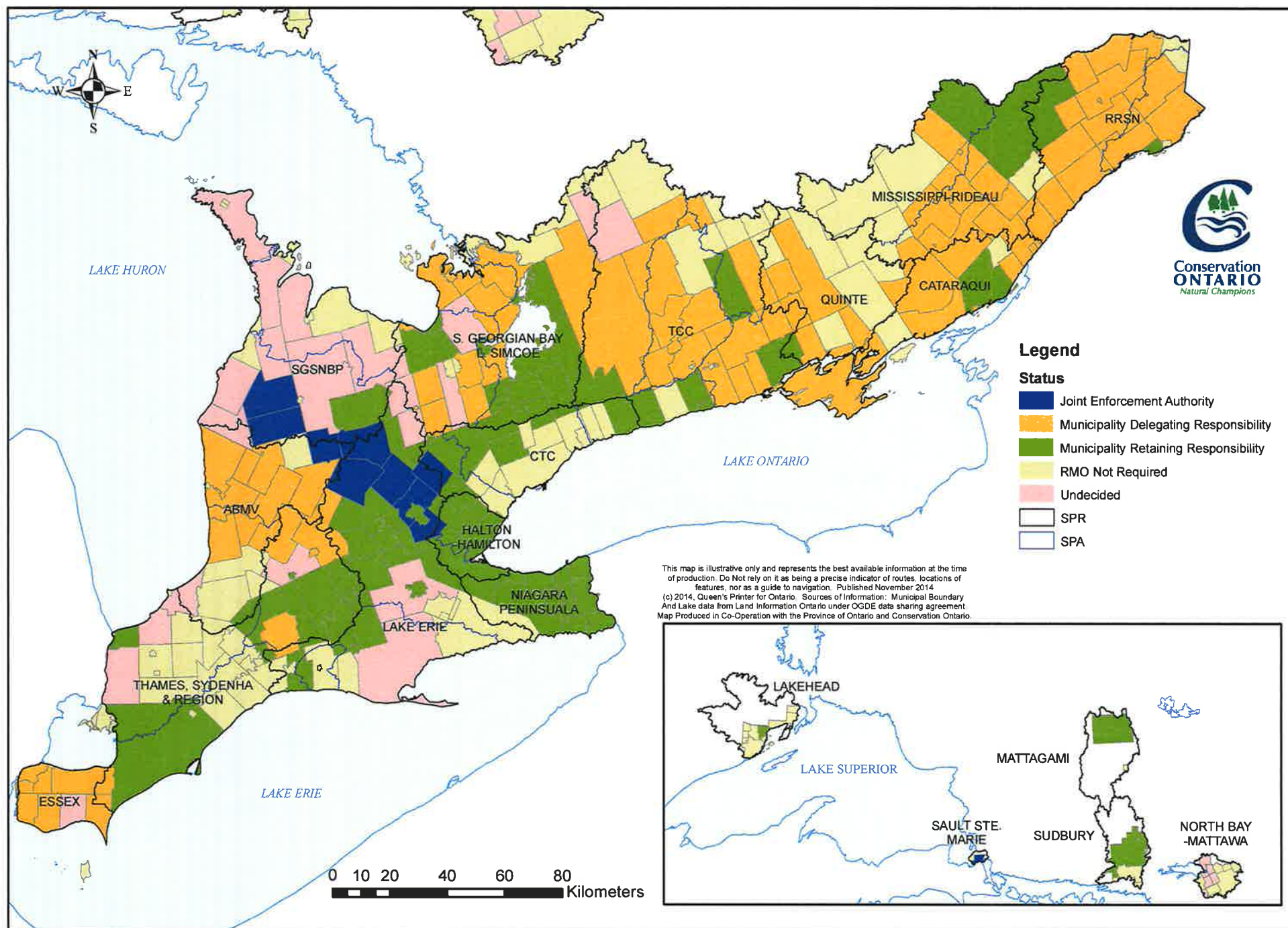
Submitted by:


Carmen D'Angelo; CAO/Secretary Treasurer

Attachment No. 1: Source Protection Areas and Regions in Ontario
Report SPA 04-15



Draft - RMO Responsibilities



THE REGIONAL MUNICIPALITY OF NIAGARA

BY-LAW NO. 49-2014

A BY-LAW TO APPOINT A RISK MANAGEMENT OFFICIAL AND
A RISK MANAGEMENT INSPECTOR
FOR THE PURPOSE OF THE *CLEAN WATER ACT, 2006*
AND TO REPEAL BY-LAW NO. 83-2013

WHEREAS Subsection 47(1) (b) of the *Clean Water Act, 2006* (the "Act"), provides that an upper-tier municipality that has authority to pass by-laws respecting water production, treatment and storage under the *Municipal Act, 2001* is responsible for the enforcement of Part IV of the Act in the municipality; and

WHEREAS subsection 47(6) of the Act provides that a municipality that is responsible for the enforcement of Part IV of the Act shall appoint a risk management official and such risk management inspectors as are necessary for that purpose.

NOW THEREFORE the Council of The Regional Municipality of Niagara enacts as follows:

1. That Kristin Pressey be appointed a Risk Management Official under subsection 47(6) of the Act; and
2. That Kristin Pressey be appointed as Risk Management Inspector under subsection 46(6) of the Act.
3. That By-Law No. 83-2013 be and the same is hereby repealed.
4. This by-law shall come into force on the day upon which it is passed.

THE REGIONAL MUNICIPALITY OF NIAGARA


(Gary Burroughs, Regional Chair)


(Natasha Devos, Acting Regional Clerk)

Passed: April 10, 2014

Ministry of the Environment
and Climate Change

Source Protection Programs
Branch

14th Floor
40 St. Clair Ave. West
Toronto ON M4V 1M2

Ministère de l'Environnement et de
l'Action en matière de changement
climatique

Direction des programmes de protection
des sources

14^e étage
40, avenue St. Clair Ouest
Toronto (Ontario) M4V 1M2



March 12, 2015

MEMORANDUM

TO: Source Protection Authority General Managers
Source Protection Project Managers

FROM: Ling Mark, Director
Source Protection Programs Branch

RE: **Designation of Risk Management Inspectors Appointed by Source
Protection Authorities as Provincial Offences Officers**

As you are probably aware, section 48 of the *Clean Water Act, 2006* enables municipalities to enter into agreements with local source protection authorities (SPA) for the enforcement of Part IV policies in the source protection plans and many of you are negotiating or have developed formal agreements with municipalities to do this in your areas. In order to utilize the authorities provided under the *Provincial Offences Act* to enforce Part IV policies, these SPA-appointed Risk Management Inspectors must be designated by the Minister as Provincial Offences Officers. This designation provides the authority for the inspector to, where necessary and subject to the provisions of the *Provincial Offences Act*, commence prosecutions for offences under the *Clean Water Act*.

I am pleased to inform you that the Minister of the Environment and Climate Change has approved this designation of SPA-appointed Risk Management Inspectors (where they are enforcing Part IV of the *Clean Water Act* pursuant to a signed delegation agreement), as provincial offences officers under the *Provincial Offences Act*. For your information, a copy of the designation is attached; it will also be posted on the RMO forum. This Minister's approval is an important step to ensure that local partnerships are successful. If you have any questions regarding the designation of provincial officers, please contact Jason Jessel (Jason.Jessel@ontario.ca 416-314-1873).

As a reminder, to function as a Risk Management Inspector, SPA employees must:

- have passed the ministry's training course
- be formally appointed as Risk Management Inspector by the SPA
- operate within the framework of a signed delegation agreement between the SPA and municipality

The *Clean Water Act* also requires that all Risk Management Officials and Inspectors be re-trained every five years. Those requiring this retraining will be advised by the Source Protection Programs Branch and directed to the training site. For more information, you can contact Sam Attias (Sandra.Attias@ontario.ca, 416-314-8587).

The ministry will continue to monitor implementation and enforcement of source protection plans through the annual reports to be submitted by the source protection authorities.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ling Mark', is written over a horizontal line.

Ling Mark
Director

cc: Source Protection Committee Chairs



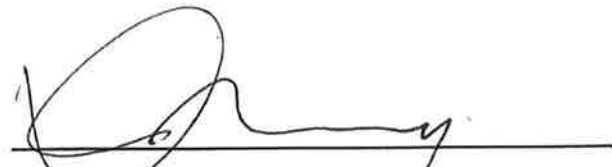
Designation of Provincial Officer

Ministry of the Environment and Climate Change

Where, pursuant to a delegation agreement entered into between a municipality and a source protection authority under section 48 of the Clean Water Act, 2006 the source protection authority is serving as the enforcement body for the purposes of Part IV of that Act, on the recommendation of the undersigned, I hereby designate every risk management inspector that is appointed by the source protection authority as a Provincial Offences Officer under the Provincial Offences Act for the purposes of enforcing Part IV of the Clean Water Act, 2006.

This designation remains in effect during the period of an individual's appointment as a risk management inspector by the source protection authority. A certificate of designation as a Provincial Offences Officer shall be issued by the source protection authority to each person hereby designated.

Designation made at Toronto this 20 day of Feb 2015



Minister of the Environment and Climate Change

Report To: Source Protection Authority (SPA) Board of Directors

Subject: Annual Reports including the Risk Management Official's (RMO's) Report

Report No: SPA 05-15

Date: April 16, 2015

RECOMMENDATION:

That the Source Protection Authority receive Report No. SPA-05-15 for information purposes.

PURPOSE:

The purpose of this report is to:

- Present the Risk Management Official's (RMO's) annual report; and
- Outline the process for incorporating the RMO's annual report into the Source Protection Authority's annual report.

BACKGROUND:

On October 1, 2014, the Niagara Peninsula Source Protection Plan (SPP) 'came into effect', and local municipalities are now required to conform to the SPP policies. A main purpose of the SPP is to reduce health risks and potential future costs by effectively managing and protecting drinking water sources.

SPP policies only apply in designated vulnerable areas upstream of municipal drinking water system intakes (see attached map). Also, the policies only apply to activities that are considered significant drinking water threats. These vulnerable areas, called Intake Protection Zones (IPZs), and the significant threats are identified in the SPP. The SPP was locally developed under the direction of the Niagara Peninsula Source Protection Committee (SPC) using a scientific approach.

A number of the SPP policies use Part IV of the Clean Water Act to manage significant drinking water threats. Under Part IV, a landowner engaged in a significant threat activity would be required to develop a Risk Management Plan (RMP) to ensure the activity does not contaminate the drinking water sources in that area. These RMPs must be approved by the Risk Management Official (RMO).

As required under Part IV of the Act, Niagara Region has established a Risk Management Official (RMO) and Risk Management Inspector (RMI) who is working with the landowners to develop and approve Risk Management Plans, and thus help ensure the safety of our drinking water sources.

The RMO must submit an annual report to the Source Protection Authority summarizing the actions that were taken in the previous calendar year to implement the SPP.

REVIEW PROCESS FOR ANNUAL REPORTS

Ontario Regulation 287/07 requires that all implementing bodies, including the RMO, report to the source protection authority on the actions taken to implement the source protection plan. The source protection authority combines the information from the various implementing bodies into one succinct report for the source protection area. Once complete, the report is provided to the source protection committee for commenting. All comments provided by the SPC are incorporated into the final version of the report provided to the MOECC. Upon submission to the MOECC, the source protection authority shall make the report publicly available. Figure 1 (below) presents a flow chart that outlines the review process for annual reports that are submitted from implementing bodies.

As per the legislation, the RMO's first annual report was received from Niagara Region in late January 2015 (attached). Progress updates from the Ontario Ministry of Transportation (MTO) is also attached. The first annual report by the SPA is not required until 2017, and will cover the period October 1, 2014 to December 31, 2016.

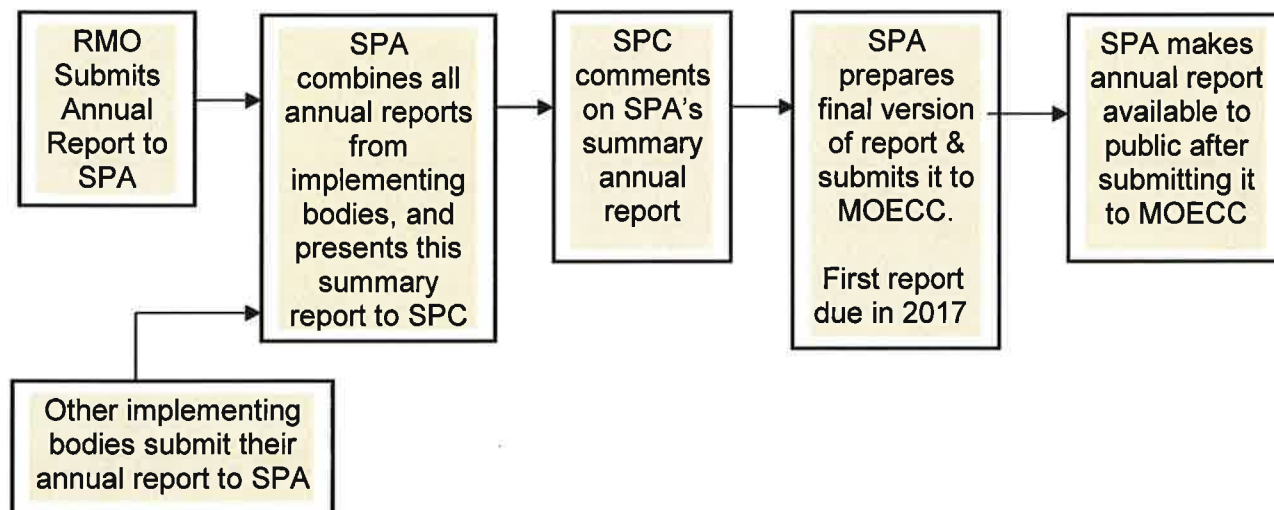


Figure 1: Review Process for Annual Reports submitted by Implementing Bodies

RELATED REPORTS AND APPENDICES:

1. Map showing Intake Protection Zones where Source Protection Plan policies apply.
2. Attachment A, Niagara Region RMO's Annual Report for 2014.
3. Ontario Ministry of Transportation Update

Prepared by:


Brian Wright; Manager, Watershed Projects

Reviewed by:

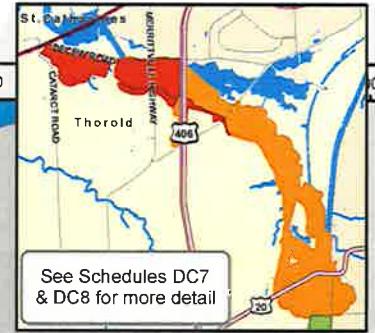
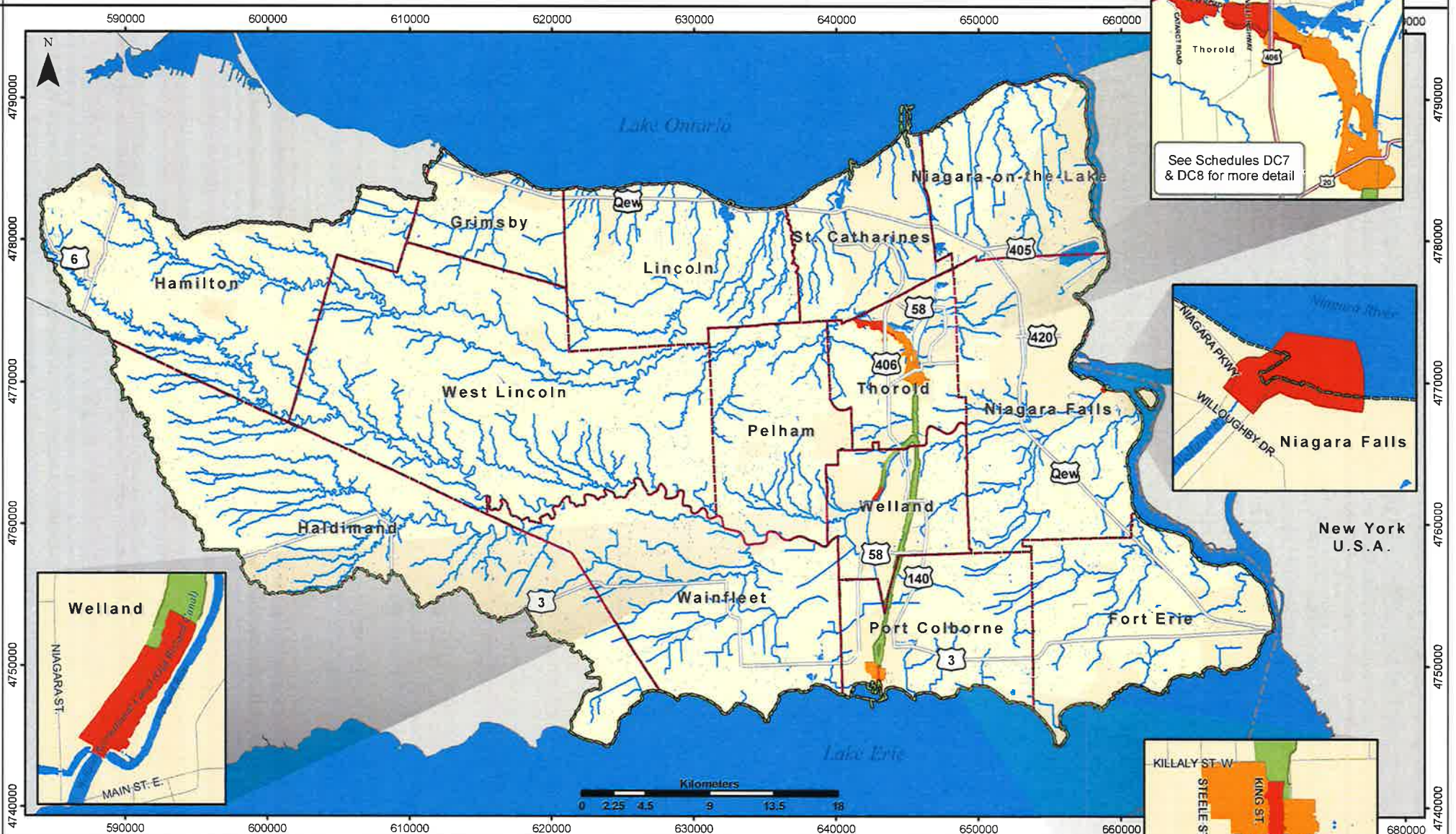

Peter Graham P.Eng., Director, Watershed

Submitted by:


Carmen D'Angelo; CAO/Secretary Treasurer

Niagara Peninsula Source Protection Plan

PA: Intake Protection Zones Where Source Protection Plan Policies Apply



Ontario

**DRINKING WATER
SOURCE PROTECTION**
ACT FOR CLEAN WATER

**NIAGARA PENINSULA
CONSERVATION
AUTHORITY**

- | | | |
|------------------|----------------------------|---------|
| — Major Highways | - - - International Border | ● IPZ-1 |
| — Major Roads | ▭ Municipal Boundaries | ● IPZ-2 |
| ~ Watercourses | ▭ Urban Area Boundaries | ● IPZ-3 |
| ■ Waterbodies | ⌘ Plan Jurisdiction | |

Disclaimer: This map is intended for illustrative purposes only. All Frames: North American Datum 1983, Universal Transverse Mercator 6° Projection, Zone 17N, Central Meridian 81° West. Produced by the Niagara Peninsula Conservation Authority with data supplied under licence by members of the Ontario Geospatial Data Exchange and by Niagara Region, 2013.

October 9, 2013



Niagara's Source Protection Annual Report: 2014

Where are we now?

Niagara  Region

www.sourceprotection-niagara.ca



This annual report is provided in accordance with Section 81 of the Clean Water Act, 2006. It outlines the activities undertaken by Niagara Region in 2014.

Background

The purpose of the Clean Water Act is to protect existing and future sources of drinking water by preventing contaminants from entering sources of municipal drinking water. There are 21 threat categories that are prescribed in the Clean Water Act and Ontario Regulation 287/07, which are considered significant drinking water threats. The Source Protection Plan (SPP) for the Niagara Peninsula Source Protection Area was approved by the Province on Dec. 12, 2013, under the Clean Water Act, 2006. The Niagara Peninsula Source Protection Area applies to the same jurisdiction as the Niagara Peninsula Conservation Authority (NPCA), and includes the Regional Municipality of Niagara as well as portions of the City of Hamilton and Haldimand County. The effective date of the Source Protection plan was Oct. 1, 2014.

Appointment

In March 2014 Regional Council approved the (Report PW-48-2014) appointment of Kristin Pressey as the Risk Management Official and Inspector.

Local Municipalities Are Engaged

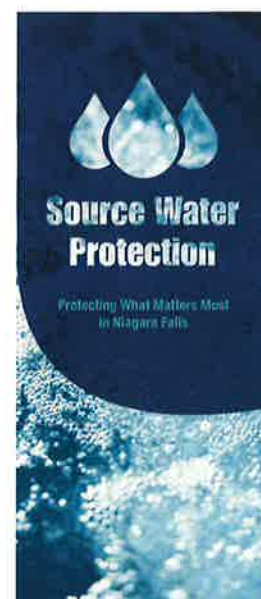
In early 2014 a working group was formed consisting of Regional, municipal and NPCA staff. This group is working on drafting official plan amendment text and mapping to conform to the Source Protection Plan and a guidance document to assist with implementation.

Planning Applications

The working group is also developing a planning and building application review process which will require applications in vulnerable areas to be circulated to the Risk Management Official for review.

Education and Outreach

A communication plan was developed to assist with Education and Outreach policies. Communication initiatives completed include informational brochures, sponsoring participation in specific training (Smart about Salt), providing an informational booth at the local Agricultural Fair as well as presentations to various groups including Niagara Snow School, a municipal stormwater management group and water compliance training.

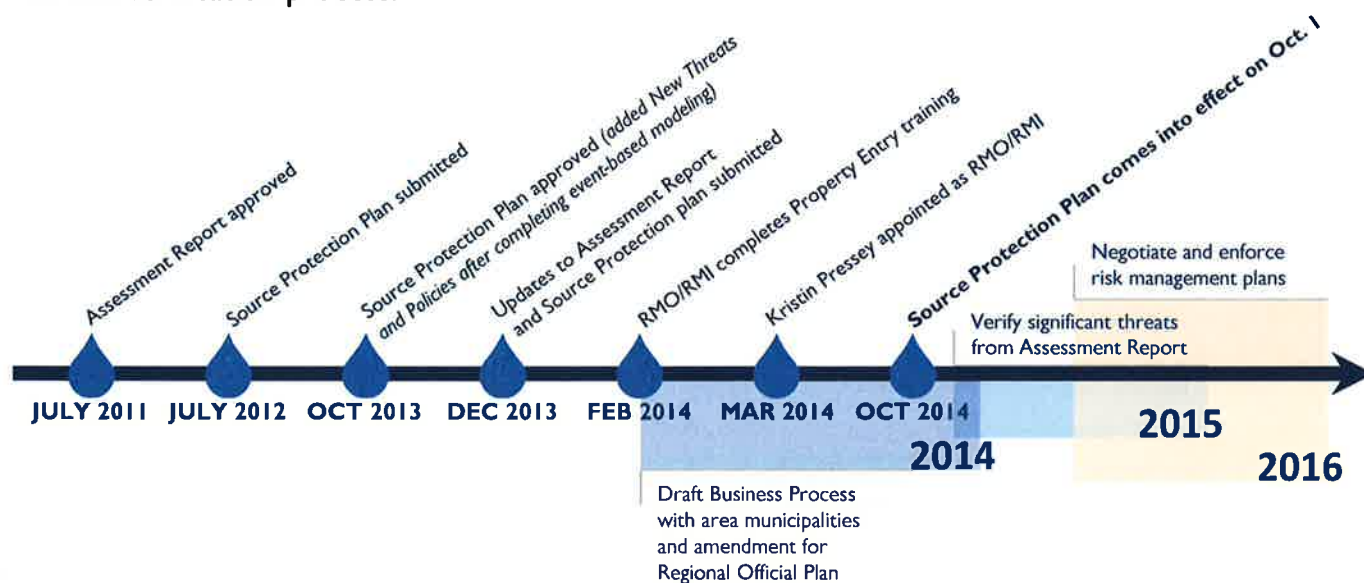


Risk Management Plans

Letters as well as follow up phone calls have been made to six property owners which were identified to have potential significant threats on their property requiring risk management plans.

Efforts to Verify Potential Significant Threats

Over the next two years, Niagara Region is planning on dedicating internal resources to verify potential significant threats (threats) identified in the Assessment Report. Potential threats to water quality were ranked as significant, moderate or low based upon proximity to drinking water sources and the volume, mobility and toxicity of a potential contaminant source defined in legislation. Significant threats are prioritized for source protection efforts. A survey has been developed to assist in the threats verification process.



Ministry of Transportation

Policy and Planning Division

Transportation Planning Branch
Environmental Policy Office
2nd Floor, 301 St. Paul Street
St. Catharines, ON L2R 7R4

Ministère des Transports

Division des politiques et de la planification

Direction de la planification des transports
Bureau de la politique de l'environnement
2^e étage, 301 rue St Paul
St. Catharines ON L2R 7R4



March 16, 2015

VIA EMAIL

Brian Wright
Project Manager, Niagara Peninsula Source Protection Authority
250 Thorold Road West, 3rd Floor
Welland, ON
L3C 3W2
bwright@npca.ca

RE: Niagara Peninsula Source Protection Plan Policy M-11

The Ontario Ministry of Transportation (MTO) appreciates the opportunity to continue working with the Niagara Peninsula Source Protection Authority during the implementation of this Plan.

MTO is supportive of providing an annual report to the local Source Protection Authority specifying the actions taken in the previous calendar year to implement significant threat policies WL-3 and DC-10 in accordance with monitoring policy M-11.

In the previous calendar year, MTO began implementing policies WL-3 and DC-10. MTO has completed a draft Emergency Response Plan and shared the emergency notification protocol with MTO field staff. MTO is currently working towards the finalization of the map that will accompany the emergency notification protocol.

If the Niagara Peninsula Source Protection Authority would like to discuss this report further, please contact Natalie Boyd, Team Lead in the Environmental Policy Office at (905) 704-2727 or Natalie.Boyd@Ontario.ca

Regards, -

A handwritten signature in black ink, appearing to read "Nicole Forbes".

Nicole Forbes

A/ Senior Policy Analyst
Environmental Policy Office
Phone: 905-704-2213
Nicole.Forbes@Ontario.ca

CC: (Email): Natalie Boyd, Environmental Policy Office, MTO
Jeff Baker, Contract Management and Operations Branch, MTO
Roger De Gannes, Highway Standards Branch, MTO
Mary Wooding, Source Protection Branch, MOECC