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## Environmental Registry of Ontario

To Whom it May Concern:

**Re: Modernizing conservation authority operations – Conservation Authorities Act  
ERO Number: 013-5018**

The Grey Sauble Conservation Authority is concerned about the proposed changes to the Conservation Authorities Act under Environmental Registry of Ontario posting ERO #013-5018, as further defined by Bill 108. Specifically, we are concerned about the proposed changes to the Conservation Authorities Act that will restrict the levy ability of conservation authorities to only for the identified “core” mandated programs of natural hazard management, management of conservation authority-owned lands, and source water protection.

We believe that this will impact the ability of the watershed-based Board of Directors to set programs on a watershed-scale which is the appropriate scale for meeting river-based water quality and quantity objectives, and may have the effect of reducing funding to conservation authorities and diverting delivery resources to accounting and municipal agreements and thus reducing the conservation authorities’ ability to carry out vital watershed health and education programs such as: environmental education; water quality sampling, recreational dam management; environmental stewardship; tree planting; natural heritage monitoring; and aligning partners and stakeholders to deliver on objectives such as those set out in the Made-in-Ontario Environmental Plan.

Our concerns are further compounded by recently announced budget cuts to flood related transfer payments, the 50-million tree program, the Southern Georgian Bay Coastal Initiative, and valuable summer job experience programs.

The Province must understand that conservation authorities already operate on limited budgets and that further reductions to funding will adversely affect the valuable programs and services that we are able to provide to member municipalities in the watershed. While provincial funding does make up less than 10% of CA budgets, the funding provided to CAs makes up about one-one hundredth of one percent of the provincial budget. Reinstating this funding will allow essential flood-related work that supports provincial objectives to continue with limited impacts on provincial finances. Flood forecasting is an integral part of emergency management, and it is vital that the Province continue to have a role in this program.

We also note that the request for comments, as listed on the ERO, is misleading to the public in terms of “Modernizing Conservation Authority Operations”. The proposal notes that the

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Watershed Municipalities  
Arran-Elderslie, Chatsworth, Georgian Bluffs, Grey Highlands  
Meaford, Owen Sound, South Bruce Peninsula, Blue Mountains

Conservation Authorities Act was introduced in 1946 at least three times in a three-page document. Nowhere in the proposal does it state that the Conservation Authorities Act underwent substantial updates in 2017 that were supported by all parties after more than two-years of public input and consultation.

The Grey Sauble Conservation Authority respectfully implores the Government of the Province of Ontario to change the proposed legislation to continue to allow conservation authorities to design programs on a watershed-scale under the governance of their municipally appointed Board of Directors. Granting this request will not impact the government's goal of improving provincial finances and will support the province's ability to leverage Conservation Authorities over 3000 staff, \$390 million in combined budgets and the goodwill of Boards and staff to help implement the Made- in-Ontario Environmental Plan.

If the Province is not willing to alter the course of the legislation that it is proposing, then we offer the following comments to compliment the proposed legislation.

It is our understanding that the proposed changes to the Conservation Authorities Act, to be enacted through Bill 108, will impose the duty on every member of an authority to act honestly and in good faith with a view to furthering the objects of the authority. We fully support this proposed change to the Act.

The Act is also to be amended to list specific programs and services that are required to be provided by an authority if they are prescribed by the regulations, which may include programs and services related to:

1. The risk of natural hazards;
2. The conservation and management of lands owned or controlled by the authority, including any interests in land registered on title;
3. The authority's duties, functions and responsibilities as a source protection authority under the Clean Water Act, 2006; and,
4. The authority's duties, functions and responsibilities under an Act prescribed by the regulations.

These mandatory programs and services should be defined as follows with additional details in regulation (see Attachment 1 for more details on each of these).

1. Programs and services related to the risk of natural hazards should include:
  - a. Natural hazard information and management actions;
  - b. Flood forecast and warning;
  - c. Ice management;
  - d. Section 28 regulation under the Conservation Authorities Act;
  - e. Planning Act plan review for natural hazards;
  - f. Niagara Escarpment Planning and Development Act permit review for natural hazards;

- g. Environmental Assessment Act review for natural hazards;
  - h. Studies supporting natural hazards assessment, such as setting, updating and communicating wave uprush and flood lines,
  - i. Provision of information and mapping to municipalities for Official Plans zoning and other municipal governance tools and,
  - j. Flood and erosion control and low flow augmentation infrastructure
2. Programs and services related to the conservation and management of conservation authority owned or controlled lands should include:
  - a. Conservation land information and management plans;
  - b. Management planning implementation;
  - c. Section 29 regulation under the Conservation Authorities Act;
  - d. Recreation water control infrastructure;
  - e. Forest management activities;
  - f. Operations and maintenance activities;
  - g. Risk management;
  - h. Operating costs;
  - i. Capital asset management, maintenance, and/or removal;
  - j. New capital investments;
3. Programs and services related to duties, functions and responsibilities as a source protection authority under the Clean Water Act, 2006 should include:
  - a. Establish and administer Source Protection Committees;
  - b. Assist the Source Protection Committees in the latter's powers and duties to be carried out under the Clean Water Act;
  - c. Assist partner Source Protection Authorities in the source protection region;
  - d. Update Source Protection Plans;
  - e. Annual progress reports; and,
  - f. Policy implementation and integration

The programs and services related to Drinking Water Source Protection, referenced as under the Clean Water Act, is too limiting to enable covering all aspects of the supporting activities (e.g. surface and ground water quality monitoring)

We note that Omnibus Bill 108 entitled "More Homes, More Choice Act, 2019" will authorized an Authority to determine the amounts owed by specified municipalities in connection with the programs and services the authority provides in respect of the Clean Water Act, 2006

While the Saugeen, Grey Sauble Northern Bruce Peninsula Source Protection Region Management Committee (the Management Committee) was supportive of including source protection authority responsibilities as one of the mandatory programs and services under the proposed changes to the Conservation Authorities Act, the

Committee expressed significant concerns with the reference to an authority being authorized to determine the amounts owed by specified municipalities in the delivery of the program requirements. To-date, the drinking water source protection program has been funded 100% through provincial transfer payments. Provincial funding agreements are viewed as critical to support the ongoing maintenance of the local Source Protection Committee, Source Protection Plan amendments, municipal implementation, and annual reporting requirements for the Source Protection Region as a whole.

If Bill 108 is passed, it could result in significant financial increases to municipal levies to deliver Clean Water Act (CWA) requirements. For example, current provincial source protection program funding for the Saugeen, Grey Sauble, Northern Bruce Peninsula Source Protection Region is approximately \$210,000 per year and has remained the same over the past few years. If these program costs were to be paid by municipalities, this could result in an estimated 7% increase in municipal levies.

Municipalities also currently deliver Part IV powers under CWA related to Risk Management Office responsibilities. For example, Grey Sauble Conservation staff have been delegated Part IV powers on behalf of 13 municipalities for an approximate cost of \$100,000 per year. As there are a total of 21 municipalities across the Source Protection Region, these additional costs to implement the source protection program should be taken into consideration as the province reviews future delivery options for the program.

It is important to note that the majority of the municipalities across our Region are smaller, rural municipalities with limited budgets. The Management Committee further expressed concerns that the downloading of source protection program costs directly to municipal budgets could result in significant tax increases for residents, or possibly cuts to key programs that support the delivery of the source protection programs (e.g. water quality monitoring programs, stewardship programs, and education and outreach programs).

Another potential issue that was identified would be the difficulty in addressing municipal costs and apportionment of these costs given the fact that source protection areas cross municipal and even watershed boundaries. The current provincial program oversight and funding model ensures consistent delivery of source protection program requirements and protection of municipal drinking water sources.

Source Protection Authorities were originally created under the CWA to ensure an efficient and effective way to deliver source protection programs that cross municipal boundaries, as recommended by Justice Dennis R. O'Connor following the Walkerton Inquiry. The Management Committee feels strongly that ultimate accountability should rest with the province and that Source Protection Authorities should not take on additional liability or accountability in its administration of the program. Furthermore,

municipalities should not have to incur additional costs in the delivery of this program, within limited municipal budgets.

4. Programs and services related to the authority's duties, functions and responsibilities under an Act prescribed by the regulations should include all activities, capital, maintenance, and operating costs to be incurred by such program and/or service

**Additionally, two 'NEW' core mandatory programs and services category is proposed:**

5. Integrated Watershed Management  
The Provincial Policy Statement 2014 and the Niagara Escarpment Plan 2017 encourage municipalities have watershed plans, and the province sought comments on provincial watershed planning guidance in 2018.

Watershed plans are comprehensive documents that include goals and targets, plans for water quantity, quality, natural hazards, climate change, cumulative effects and land use management scenarios, and an implementation strategy.

The protection and preservation of natural resources is not abstract or altruistic in Ontario, and the issues are real and consequential. Without integrated watershed management, there is limited ability to manage flooding risk, water quality and more. Multi-municipality Conservation Authority boards and governance were specifically set up to address watershed-wide issues, and this mandate should continue to fall within the core services of a Conservation Authority.

6. "Administration" which includes overhead and support costs of the Conservation Authority which are not directly related to the delivery of a specific program but are necessary for the continued existence of the Conservation Authority.

The supporting foundational activities necessary to deliver on all the core mandatory programs and services needs to be incorporated into the legislation/regulations and not categorized as "other programs and services" which is proposed to be enabled only through individual municipal agreement on budget for them. The activities described in regulation for each of these core mandatory programs and services should enable our ability to support Ontario's Environment Plan.

We note that there are currently provincial transfer payments to all conservation authorities for items "1" and "3", though those for Item "1" have been drastically reduced. It is crucial to both conservation authorities and our member municipalities that the Province continue to provide both a leadership and partnership role in these items, and to provide meaningful financial support to these vitally important public safety programs.

It is our understanding that conservation authorities will be able to levy the municipalities for core mandatory programs and services that conservation authorities are expected to deliver for

the Province and that non-mandatory programs and services will require individual agreements between conservation authorities and municipalities for funding support in order for the conservation authority to levy for the amount necessary to support the associated capital costs and operating expenses.

Based on the legislative changes proposed through Bill 108, conservation authorities continue to be authorized to provide other programs and services, including programs and services that it determines to be advisable to further its objects. This is a very good decision on the part of the Province to allow conservation authorities the legislative ability to continue to offer these valuable programs and services to our communities.

However, we also note that if financing by a participating municipality under section 25 or 27 of the Act is necessary in order for the authority to provide such programs and services, the authority and the participating municipality must enter into an agreement in order for the authority to provide the program or service. On and after a day prescribed by the regulations, the authority is prohibited from including capital costs and operating expenses in respect of such programs and services in its apportionment of payments to the participating municipality if no such agreement has been entered into. Authorities are required to prepare and implement a transition plan in order to ensure they are in compliance with this requirement when it takes effect.

We are strongly opposed to the proposal to require transition plans and agreements with individual municipalities to levy for these services. All of the programs and services provided by Grey Sauble Conservation Authority and other conservation authorities are valuable at a watershed-scale. As noted above, we believe that this proposed change to the Act will impact the ability of the watershed-based Board of Directors to set programs on a watershed-scale, and may have the effect of reducing funding to conservation authorities and thus the conservation authorities' ability to carry out vital watershed health and education programs. This change may also have the effect of impacting participating municipalities if adjacent municipalities in the watershed choose to opt-out of the programs and services. The impacts of this will be two-fold in that:

- (a) Multiple municipalities within the same watershed should be carrying out the same programs to reap the desired outcomes;
- (b) Removal of some municipalities from the provision of service will increase the costs borne by those municipalities that continue to participate, thereby reducing the benefits of the economies of scale that a watershed-based approach provides.

The proposed transfer of responsibility for funding of the Drinking Water Source Protection program to the municipalities raises concern. Provincial funding of the program provided an equitable approach across the province, such that all local programs and studies of municipal water systems were funded according to their complexity and needs.

The establishment of Source Protection Authorities (SPAs) enabled a consistent delivery and oversight of source protection program requirements along with implementation. If funding were to be provided to individual municipalities this would likely lead to inconsistent application of the Clean Water Act requirements across Source Protection Areas and different levels of source water protection for residents across the province.

A further funding challenge exists for a few municipalities (e.g. Northern Bruce Peninsula and Severn Sound) who are also identified as Source Protection Authorities under the Clean Water Act, as they play a dual role in terms of source protection program oversight as well as implementation requirements.

Grey Sauble Conservation Authority has no concern with the proposal to enable the Minister to appoint an investigator to investigate or undertake an audit and report on a conservation authority.

## **ADDITIONAL COMMENTS FOR REGULATIONS TO SUPPORT BILL 108 CHANGES TO THE CONSERVATION AUTHORITIES ACT**

Water transcends municipal boundaries and it is vital that the Conservation Authorities Act continue to support a watershed approach to program and services. Members of Conservation Authority Boards of Directors are appointed by all involved municipalities, and this integrated watershed management governance provides an essential multi-municipality perspective on which program investments will most benefit Ontario's watersheds.

The scope of standards and requirements described in the regulations need to capture climate change and foundational activities that support our ability to deliver on the core mandatory programs and services. All of these activities are not necessarily directly identified in 'prescribed' legislation (e.g. water quantity and quality monitoring data collection).

We respectfully request that the standards and requirements regulation that is developed to support the legislation include the following program and service functions within the noted "Mandatory Programs and Services":

### **Programs and Services Related to the Risk of Natural Hazards**

1. Natural Hazard Information and Management Actions - Procedures undertaken by conservation authorities, to support the conservation authority delegated role from the Ministry of Natural Resources and Forestry to represent the provincial interest by reviewing policy documents and development proposals processed under the Planning Act and the Niagara Escarpment Planning and Development Act for consistency with the PPS Natural Hazard policies and to participate in the review of applications for Special Policy Area approval. To inform flood forecast and warning and low water response. To adequately assess the risk of loss of life and property damage in the review of Section 28 permit applications and to

take management actions to reduce the risks. This includes, wages/benefits and materials/expenses to deliver the following:

- Watershed/Shoreline data collection and monitoring for hazard-related technical studies;
  - Data management
  - Modelling and analysis to determine hazard areas (e.g. flood, erosion)
  - Hazard mapping (including floodplains)
  - Impact assessments (including climate vulnerability assessments)
  - Updating (and/or new) watershed management, shoreline management and ice management plans and studies (e.g. coastal engineering study) specific to hazards
  - Coordination
  - Development of strategies and policies that support hazard management (e.g. operating policies for flood control structures, restoration prioritization and strategies, conservation and hazard land acquisition planning strategies, climate change adaptation strategies, policies for appropriate management and use of hazard lands)
  - Implementation of hazard priority stewardship projects: shoreline protection and erosion control (e.g. projects initiated under the CO Class EA for Remedial Flood and Erosion Control Projects; restoration/naturalization; Low Impact Development techniques; and restoration of watershed vegetative cover to reduce flood and erosion impacts)
  - Hazard land securement and management
  - Communications, outreach and public education activities
  - Associated training
2. Flood Forecast and Warning - Procedures, undertaken by Conservation Authorities, required to reduce the risk of loss of life and property damage due to flooding through the forecasting of flood events and the issuing of flood warnings, alerts and advisories to prepare those who must respond to the flood event; including wages/benefits and materials/expenses to deliver the following:
- Weather and watershed data collection and monitoring
  - Data management and mapping
  - Modelling and analysis to determine warning priority areas
  - Flood forecasting tools (e.g. internal and external flood emergency preparedness manuals)
  - Response and recovery analysis (post-event)
  - Daily/Emergency operations
  - Coordination (e.g. participation in emergency response planning)
  - Communications, outreach and public education activities
  - Training
3. Ice Management - Procedures, undertaken by conservation authorities, required to reduce the risk of loss of life and property damage associated with flooding and erosion from ice build-up and jamming; including wages/benefits and materials/expenses to deliver the following:



- Data collection/monitoring of known ice jam locations and other ice jamming events
  - Data management and mapping
  - Analysis of ice jam predictions and ice breakup
  - Ice jam hazard reduction works (e.g. dredging, ice booms, active breaking/removal)
  - Operation/Maintenance of ice control structures/equipment
  - Coordination
  - Communications, outreach and public education activities
  - Training
4. Section 28 Regulation under the Conservation Authorities Act – Procedures undertaken by CAs, required to assess the risk of loss of life and property damage in the review of permit applications in or adjacent to river or stream valleys, Great Lakes and large inland lakes shorelines, watercourses, hazardous lands and wetlands, including wages/benefits and materials/expenses to deliver the following:
- Pre-consultation with applicants
  - Issuance of permits
  - Confirmation of compliance with permit conditions
  - Enforcement of regulations
  - Hearings and appeals
  - Natural Hazard Information activities (see 1.) that support implementation of the program
  - Development of and consultation on implementation policies and regulatory mapping
  - Regular reporting on service delivery standards
  - Coordination with other regulators [e.g. Drainage Act and s.28 Regulations Team (DART)]
  - Communications, Outreach and Public Education activities including website updating and maintenance
  - Training
  - Regulations screening mapping
5. Plan Review and EA Review for Natural Hazards - Policy support provided by conservation authorities, through the Ministry of Municipal Affairs (MMA) and Ministry of Natural Resources and Forestry (MNRF), on matters of provincial interest relating to the Natural Hazards (Section 3.1 under Public Health and Safety made under the Provincial Policy Statement - excluding forest fire) and focusing on the Official Plan, Official Plan Amendment, and Comprehensive Zoning By-Law stages at all municipal levels and applications submitted pursuant to the Planning Act . As well, CAs review provincial Environmental Assessments (EA) for natural hazards concerns, and comment on new or expanded Special Policy Areas. This includes wages/benefits and materials/expenses to deliver the following:
- Pre-consultation with applicants
  - Broad policy interpretation and comment
  - Natural Hazard Information activities (see 1.) that support implementation of the program

- Appeals of planning decisions
  - Transfer of data, information and science (see 1. Natural Hazard Information activities) to municipalities, Niagara Escarpment Commission, applicants or EA proponents,
  - Provision of advice on matters relating to natural hazards policy to MMA and provincial EA project proponents
  - Communications, outreach and public education activities
  - Training
6. Low Water Response - Procedures, undertaken by Conservation Authorities, required to inform and coordinate those who must respond to the low water event; including wages/benefits and materials/expenses to deliver the following:
- Data collection and Monitoring
  - Data management
  - Modelling and analysis of climate and flow data
  - Update studies and reports
  - Coordination of multi-stakeholder Low Water Response teams
  - Operate dams/reservoirs
  - Communications, outreach and public education activities
  - Training
7. Flood and Erosion Control and Low Flow Augmentation Infrastructure – This includes structures which were approved by the MNRF and are owned, maintained and/or operated by conservation authorities, which mitigate risk to life and property damage from flooding and/or erosion and/or which assist in managing the impacts of low water events . Procedures, undertaken by conservation authorities, required to operate and maintain these structures; including wages/benefits and materials/expenses to deliver the following:
- Data collection and monitoring to support inspections/surveillance and operations
  - Data management
  - Planning to identify studies, maintenance and repairs for management of existing infrastructure
  - Operation of structures
  - Routine/minor, preventive, and, major maintenance on structures
  - Communications, outreach and public education activities
  - Training

### **Programs and Services Related to the Conservation and Management of Lands Owned or Controlled by the Authority**

1. Conservation Land Information and Management Plans Management of Conservation Authority Lands- Procedures undertaken by conservation authorities, to develop conservation area management plans consistent with the needs of the level of public use. Conservation

lands can range from i) accessible to the public for active uses (e.g. Campgrounds, education centres, recreational facilities, hiking trails, cultural heritage, reservoirs, lakes, boating), ii) accessible to the public for passive uses (e.g. seasonal hunting, natural heritage, research), to, iii) no public access (e.g. hazard properties). This includes, wages/benefits and materials/expenses to deliver the following:

- Data collection and monitoring
  - Data management
  - Analysis and mapping to determine use areas
  - Public information and risk signage (including mapping for signage)
  - Climate vulnerability assessments and adaptation strategies
  - Development and consultation on management plan
  - Coordination
  - Development of strategies and policies (including financial) that support the management objectives for the conservation area and meet legislative requirements for accessibility and public safety
  - Implementation of approved management plan initiatives
  - Implementation of priority stewardship and restoration projects (e.g. invasive species removal, trail/boardwalk and habitat improvements, woodlot management)
  - Ongoing forest management planning and operations
  - Regular inspections and maintenance of the property, facilities and infrastructure (e.g. buildings, parking lots, washrooms, trails)
  - Capital asset management and renewal
  - Review, management, and payment of property taxes
  - Development and management of permits, license agreements, lease agreements, partnership agreements, etc.
  - Conservation authority property operational activities (e.g. Operating parking areas, campgrounds, beaches, trails, etc.)
  - Communications, outreach and public education activities
  - Training
2. Section 29 Regulation under the Conservation Authorities Act – Procedures undertaken by conservation authorities, to regulate public use of the conservation authority properties including wages/benefits and materials/expenses to deliver the following:
- Development of and consultation on implementation policies
  - Communications, outreach and public education activities (including signage)
  - Enforcement of regulations (with an emphasis on public safety; including ability to use set fines) and the Trespass to Property Act
  - Training
3. Recreation Water Control Infrastructure – This includes structures which were approved by the MNRF and are owned, maintained and/or operated by conservation authorities, which serve a recreation function and are located on conservation authority lands. Procedures,

undertaken by conservation authorities, required to operate and/or maintain these structures; including wages/benefits and materials/expenses to deliver the following:

- Data collection and monitoring to support inspections/surveillance and operations
- Data management
- Planning to identify studies, maintenance and repairs for management of existing infrastructure
- Operation of structures
- Routine/minor, preventive, and, major maintenance on structures
- Undertake EA / studies to identify opportunities for decommissioning on a priority basis
- Communications, outreach and public education activities
- Training

### **Programs and Services related to the Authorities duties, functions and responsibilities as a source protection authority under the Clean Water Act, 2006**

1. Establish and administer Source Protection Committees (SPC): The 19 lead SPAs are required to establish, provide oversight and administer the 19 local SPCs for local decision making. This is accomplished through tasks including:
  - Prepare a summary of SPC functions and SPC member obligations
  - Maintain membership by managing expiries and removals, and by advertising for appointments and selecting appropriate members from applicants
  - Increase or decrease SPC size per regulations
  - Coordinate SPC meetings, set agendas, provide materials, host meetings, record notes
  - Communications, outreach and public education activities.
2. Assist the SPC in the latter's powers and duties to be carried out under the Clean Water Act: Conservation authorities fulfill their delegated roles as source protection authorities under the Clean Water Act by providing the required scientific, technical and administrative support and resources to the decision making SPCs, as follows:
  - Maintain a central website for Source Protection Regions for SPC meeting information, online publicly available source protection plan and other resources
  - Conduct watershed-wide water quality and quantity monitoring (groundwater and surface water) for early detection of source water quality and quantity problems
  - Update regional water budget modeling studies to assess for factors such as growth, demand and climate change
  - Conduct climate change vulnerability assessments to ensure that climate change impacts are assessed, which in turn supports effective policy making through source protection plan updates
  - Notify the SPC of source water quality and quantity problems, changes in landscape, and changes in other policy documents that may have an impact on drinking water sources
  - Provide data retention and information management

- Communications, outreach and public education activities
  - Keep municipal councils and councilors informed and aware of program progress and their obligations.
3. Assist partner SPAs in the source protection region: The 19 lead SPAs assist partner SPAs within the SPR in exercising and performing their powers and duties under the Clean Water Act by various tasks including:
- Provide scientific, technical and administrative support and resources to other SPAs in the SPR including project management, work planning and funding applications, financial and progress report back to the Ministry of Environment, Conservation and Parks (MECP) three times a year, and maintain a SPR management review committee
  - Serve as a liaison between the Ministry and the other SPAs in the SPR
  - Coordinate the Terms of Reference, Assessment Reports and Source Protection Plans for the source protection areas within the SPR so they do not conflict with each other
  - Provide orientation to new conservation authority board members on their duties as SPA board members
  - Communications, outreach and public education activities.
4. Update Source Protection Plans: In order to fulfill the mandate of the Clean Water Act to protect sources of municipal drinking water, the SPAs propose and prepare various updates to source protection plans including assessment reports. This includes various activities:
- Identify whether updates to assessment reports and plans are necessary to improve implementation.
  - Provide advice and liaise with municipal residential drinking water system owners to support source protection planning for new or changing systems.
  - Develop workplan for source protection plan updates per Minister's S. 36 Order.
  - Undertake amendments/updates under S.51 (General Regulation); S. 34; S. 35; and/or S. 36 to address various factors such as land use, population growth, challenges with plan policies, etc. resulting in vulnerable area mapping changes and/or policy revisions
  - Conduct consultations on source protection plan amendments/updates
  - Communications, Outreach and Public Education activities
  - Submit updated source protection plans (including assessment reports) to the MECP.
5. Annual progress reports: SPAs are required to prepare annual progress reports for each source protection plan, to monitor implementation progress and assess the effectiveness of policy implementation. This entails various activities including:
- Data and information collection from all policy implementing bodies for reportable items prescribed by the MECP
  - Data entry to the MECP prescribed Electronic Annual Reporting (EAR) online database
  - Facilitate review of the annual report by the SPC and then submit report to the MECP
  - Communications, Outreach and Public Education activities, including public websites and mapping.

6. Policy implementation and integration: SPAs provide policy interpretation and implementation advice to policy implementing bodies, in order to support the mandate of the SPCs in protecting drinking water sources in Ontario. Conservation Authorities are also implementing bodies and must comply with an obligation to implement a significant threat policy or designated Great Lakes policy.
- Provide advice and program support to municipal staff and other implementing bodies to assist with policy interpretation and resolve issues with policy implementation
  - Provide advice on the review of local applications / decisions in vulnerable areas to ensure integration of source protection planning into other water management processes including watershed management plans, Permit To Take Water, etc.
  - Implement significant threat policies to address drinking water threats and if established, comply with mandatory source protection plan policies for Great Lakes targets.
  - Implement priority drinking water source stewardship projects: e.g. septic system inspection programs, low impact development, well decommissioning, soil phosphorus tests, etc.