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November 27, 2019

Michael Helfinger, Senior Policy Advisor
Ministry of Economic Development, Job Creation and Trade
56 Wellesley Street West, 11th Floor
Toronto, ON
M5S 2S3

Re: Bill 132, Better for People, Smarter for Business Act, 2019 (ERO #019-0774)

Dear Mr. Helfinger:

Thank you for the opportunity to review and comment on the above noted Environmental Registry of Ontario (ERO) posting. The following Region of Peel staff comments are in response to proposed changes to simplify and modernize regulations, eliminate outdated or duplicative rules and make regulatory processes more efficient for businesses and people.

Regional staff have separately submitted comments on the ERO legislative and regulatory proposals specific to the Ministry of the Environment, Conservation and Parks and the Ministry of Natural Resources and Forestry listed below. These comments are outlined in the attachment for reference.

- Proposed amendments to the *Aggregate Resources Act* (ERO #019-0556)
- Changing the Mandate of the Resource Productivity and Recovery Authority (ERO #019-0671)
- Holding polluters accountable by expanding the use of administrative monetary penalties for environmental contraventions (ERO #019-0750)
- Amendments to the Wells Regulation, (ERO # 013-1513)

A report, containing staff comments on the amendments to the Aggregate Resources Act will be brought forward to Regional Council on December 12, 2019. These comments are subject to Council endorsement, and therefore a copy of the report and Council resolution will be forwarded to the Ministry of Natural Resources and Forestry for further consideration.

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We look forward to continuing to work with the Province to provide municipal insights related to Bill 132 and Ontario's Open for Business Action Plan. Regional staff would be pleased to discuss any clarifications or provide additional comments as required.

Sincerely,

Andrew Farr, P.Eng.
Commissioner Public Works (Acting)
Region of Peel
10 Peel Centre Drive, Suite A (5th Floor)
(905) 791-7800 x4395

Attachments:

- Proposed amendments to the *Aggregate Resources Act* (ERO #019-0556)
- Changing the Mandate of the Resource Productivity and Recovery Authority (ERO #019-0671)
- Holding polluters accountable by expanding the use of administrative monetary penalties for environmental contraventions (ERO #019-0750)
- Amendments to the Wells Regulation, (ERO # 013-1513)

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November 4, 2019

Andrew MacDonald
Ministry of Natural Resources and Forestry
Natural Resources Conservation Policy Branch
300 Water Street
Peterborough, ON, K9J 8M5

Re: Proposed Amendments to the Aggregate Resources Act (ERO #019- 0556) and Bill 132 – (Schedule 12) – the proposed Better for People, Smarter for Business Act, 2019 (ERO #019-0774)

Thank you for the opportunity to comment on the proposed amendments to the *Aggregate Resources Act* (the Act) and the proposed regulatory changes under the Act. This response letter contains comments provided by Regional of Peel staff for consideration by the Ministry of Natural Resources and Forestry (MNRF). Regional staff has provided comments on the proposed amendments and additional technical comments related to fees, site rehabilitation, excess soil and aggregate recycling. Please be advised that Regional Council endorsement of these comments is pending. Following endorsement by Regional Council a copy of the Regional Council Resolution will be sent to you for further consideration.

Region of Peel Staff Comments on Proposed Aggregate Resources Act Changes

1. **Bill 132 revisions to Section 12 of the Act proposing to remove the ability of the Minister or the Local Planning Appeal Tribunal (LPAT) to have regard to road degradation that may result from proposed truck traffic to and from the site.**

   Where circumstances warrant, it would be appropriate that licence conditions include a requirement that the adequacy and safety of the haul route and site access be confirmed prior to the commencement of operations that remove aggregate from a site, including requirements that road improvements be implemented prior to operations. Currently municipalities have the ability to enter into agreements with aggregate operators to ensure the adequacy of proposed haul routes and site access and other conditions related to the municipal road right of way.

   The proposed changes to Section 12 should be removed from the Bill or clarified to enable the Minister or LPAT to have regard for the adequacy and safety of haul routes and site access and impose appropriate licence and site plan conditions to require improvements where circumstances warrant if this is not the intent of the proposed changes. The ability to include conditions on site plans referencing agreements should be maintained in the legislation and implementing licencing framework. Further clarification regarding the intent of the proposed change is needed.

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Recommendations:

- **That Section 12, Clause (1) (h) of the Act be retained to enable the Minister and LPAT to have regard to the proposed haul route and impact of truck traffic to and from the site.**
- **That the proposed exception to Clause (1) (h) as proposed be removed from the Bill or revised to clarify that the limitation of the Minister and LPAT regarding degradation of the roadway does not include consideration of the adequacy or safety of the haul route or site access.**
- **That the legislation continues to allow municipalities to enter into agreements with aggregate producers regarding cost sharing of required road improvements when circumstances warrant.**

2. **Bill 132 revisions to add Section 12.1 to the Act restricting zoning by-laws from regulating the depth of extraction.**

Regional staff acknowledge the need for clarification of municipal zoning authority with respect to the ARA to regulate below water table extraction and has no objection to the regulation of a specified depth of extraction below water table under the ARA. However, Regional staff does not support limiting municipal land use planning and zoning authority to regulate whether licenced operations may extract above or below water table.

Established policies in the Town of Caledon Official Plan allow new operations or expansions to existing operations to be designated either Extractive Industrial A Area for above water table extraction or Extractive Industrial B Area for below water table extraction. Policies require an official plan and zoning by-law amendment to change an extractive operation from Extractive Industrial A Area to Extractive Industrial B Area. The ability to require a *Planning Act* approval enables municipalities to request and review appropriate studies, determine whether impacts to water resources are acceptable and approve or refuse an application to extract below water table if impacts are deemed unacceptable. This authority should be maintained and not be limited by the proposed changes to the ARA.

Recommendation:

- **That proposed Section 12.1 making zoning by-laws that regulate the depth of extraction inoperative be removed from Bill 132 or that the provision be clarified to enable municipalities to continue to permit or prohibit above or below water table extraction through municipal official plans and limit the restrictions on zoning by-laws in the ARA to the regulation of a specified depth of extraction only.**

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3. **Bill 132 revision to add Section 13.1 to the Act setting out the enabling provisions and process for existing licences to be amended to allow extraction below the water table including the ability to request the Minister to refer applications to the LPAT.**

   The ability to request the Minster to refer amendments to existing licences requesting extensions below water table to the LPAT is an important addition to the legislation.

   Implementing regulations should prescribe appropriate requirements to notify adjacent landowners, municipalities and agencies when requests to amend existing licences and site plans are submitted to the MNRF and prior to the Ministry's decision on the application.

   The proposed changes to the Act should be further strengthened through corresponding revisions to the ARA policy framework standards, policies and procedures to update required hydrogeological study requirements for extraction below water table. Improvements to study standards are needed to ensure that impacts to water resources are understood and that water resources are protected. Recommended study terms of reference should include requirements for cumulative impact assessment where cumulative impacts to water resources are a relevant consideration (e.g. in areas where aggregate operations are concentrated or in subwatersheds where water budget studies indicate stressed water resource conditions). Application requirements, in addition to process improvements, should be required to meet rigorous study standards.

   This proposed change addresses the Region's previous recommendation to eliminate the permissions to allow applicants to seek approval to extract below water table through the current site plan amendment process. The proposed changes enhance process accountability, transparency and integrity of the ARA's licence amendment process.

   Recommendation:

   - **That the Province strengthen and update hydrogeological study requirements contained in the implementing Provincial Standards, Policies and Procedures for Aggregate Resources governing the regulation of existing and new extraction operations to ensure rigorous study standards are implemented in the review of licence amendments proposing below water table extraction.**

4. **Bill 132 revision to Section 34 of the Act to clarify that municipal zoning authority does not extend onto Crown Lands.**

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Regional staff is not opposed to MNRF's proposed clarification that municipal zoning authority does not extend onto Crown land. This is consistent with section 71 of the *Legislation Act* which provides that the Crown is not bound by an Act unless expressly stated. However, subsection 6(2) of the *Planning Act* requires a ministry to consult with and have regard for the established planning policies of the municipality before carrying out or authorizing any undertaking that the ministry considers may directly affect the municipality. Regional staff recommend that this *Planning Act* provision be respected and reflected in the aggregates policy framework.

Recommendation:

- **The Act should be amended, as proposed, to clarify municipal zoning authority on Crown lands.**

5. **Bill 132 revisions to add a new Section 13.2 to the Act which requires licensees to apply for a new licence when expanding the boundary of an operation, except when the expansion is wholly within a road allowance directly adjacent to the boundary of the subject area.**

Regional staff supports the proposed changes to the Act to require an applicant to apply for a new licence when expanding the boundary of an operation. The Ministry is encouraged to provide the same level of rigor in the review and consultation of applications for an expansion, as is required with licence applications for a new site. This ensures an opportunity for municipal participation in the licencing process for expansions to existing operations.

Regarding access to resources located within an adjacent road right of way, staff do not object to a streamlined application process to permit expansions through a licence and site plan amendment process. Regional staff recommend that the prescribed conditions through which applications will be considered have regard to official plan policies and zoning designations.

Recommendation:

- **That the ARA policy framework's standards, policy and procedures considering applications for extraction within adjacent road rights of way be clarified to ensure that municipal official plan policies and zoning is in place.**

6. **Bill 132 revision to add Subsection 13 (3.2) to the Act providing flexibility to permit self-filing of routine site plan amendments without the need for the Minister's approval.**

It is unclear what types of operations would be considered "routine site plan amendments". Previously through Bill 39 – *The Aggregate Resources and Mining Modernization Act* (Bill 39), the Province proposed a permit by rule approach to

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exempt low risk activities from the licencing process if certain conditions were met. At that time, the Region requested clarification of the conditions and circumstances under which self-filing would be permitted, the limiting of self-filing to only minor amendments, and to be consulted on the scope of amendments to be permitted through self-filing. Further consultations on the criteria for allowing self-filing of routine site plan amendments is requested.

Recommendation:

- **That municipalities be consulted on the criteria and scope of site plan amendments that may be permitted through self-filing.**

Regional Staff Comments on Proposed Regulatory Changes

1. Enhanced Reporting on Rehabilitation

   Regional staff supports detailed reporting on rehabilitation in both the compliance and inspection process. Enhanced reporting through the annual compliance report process would encourage greater efforts to complete rehabilitation works. Through the Bill 39 process, the Region recommended inspection reports include details on rehabilitation compliance. This would allow the findings of an inspectors report to be used as a tool to communicate actions or measures that could be taken to remedy site plan contraventions related to rehabilitation.

   Recent changes to the Provincial Policy Statement and Greenbelt Plan encourage comprehensive rehabilitation planning to ensure rehabilitation on adjacent sites are coordinated and complementary. The MNRF is encouraged to require operators to report on efforts to support comprehensive rehabilitation planning where the municipality has approved a Comprehensive Rehabilitation Master Plan.

2. Self-filing for Changes to Existing Site Plans for Routine Activities

   The MNRF should specify under what circumstances self-filing would be permitted and provide an opportunity for municipal engagement during the process to develop regulations prescribing the amendments to site plans that may be registered through this process.

3. Management of Low-risk Activities

   In principle, streamlined permissions and approval requirements for low-risk activities are supported. Regional staff encourages the Province to undertake further consultations on the criteria for allowing low risk operations to proceed without a licence and clarify the requirements for when a pit or quarry operation will be allowed without a licence.

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4. Compliance Reporting Requirements

   Regional staff is supportive of streamlining compliance reporting requirements provided that reporting details continue to include information necessary to document compliance with site plan conditions. The Region currently receives and referenced these reports to monitor operations, in particular, the progress of rehabilitation at sites. However, compliance reporting is one component of monitoring and should not be a substitute for aggregate operation inspections. The Province should address the need for more MNRF aggregate operations inspectors and the need for more frequent inspections and reporting on inspections.

5. Reviewing Application Requirements for New Sites, Including Notification and Consultation Requirements

   Regional staff supports the review and updating of application requirements for new sites and recommends that revisions ensure that regulations enable appropriate study standards and requirements to be prescribed and required in the licencing process. Notification and consultation requirements should ensure there is clear communication and notification to municipalities and the public with sufficient timelines for review and comment on application proposals.

   This process should also review and comprehensively update the study requirements prescribed in the ARA policy framework's standards, policies and procedures to include current best practices, including updating water and air quality impact assessment requirements.

   One of the purposes of the Aggregate Resources Act is "to minimize adverse impacts on the environment in respect to aggregate operations". With respect to air quality, the Region encourages both the MNRF and the Ministry of the Environment, Conservation and Parks to assess and monitor the cumulative impacts of current and proposed aggregate facilities on the local airshed. MNRF should consider requiring all aggregate operations, regardless of the type of extraction, or annual tonnage of extraction, to submit an air quality study, including an assessment of cumulative impacts, as part of their licence application. The Region encourages the consideration of cumulative effects to be mandatory for all applicants.

   The province should also consider requiring continuous on-site monitoring of air quality (at representative locations along the boundaries of the quarry and potentially on the immediate road(s) where trucks will enter and exit the quarry from) during the operation of the pit or quarry, similar to the water quality monitoring which is currently undertaken. This would allow the operator to immediately implement a mitigation plan.

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Previously through Bill 39 several clauses such as section 12.2, which require the licensee to serve a copy of the licence and a copy of the final site plan to the clerk of each municipality in which the site is located, were proposed to be repealed. The Region requests assurances that decisions, licence information and notices to municipalities will continue to be maintained and provided for transparency. If removed from the legislation, the Ministry should ensure that proper procedure guidance is contained with the Standards, Policies and Procedure Manual. MNRF should provide simpler access to licence and site plan documents electronically.

6. Clarifying Requirements for Site Plan Amendment Applications

   The review and clarification of requirements for site plan amendments should ensure that regulations enable appropriate study standards and requirements to be prescribed and required in the site plan amendment process. Notification and consultation requirements should ensure there is clear communication and notification to municipalities and the public with sufficient timelines for review and comment on major site plan amendment proposals.

Regional Staff Comments on the Additional Considerations

1. While no changes to aggregates fees are being proposed at this time, the Province is also interested in hearing feedback on this matter.

   Regional roads are often designed for goods movement and used as haul routes. The increasing costs associated with providing this infrastructure should be considered if the Ministry is intending to further review the fee structure. Municipal associations such as the Top Aggregate Producing Municipalities of Ontario (TAPMO) and the Association of Municipalities of Ontario (AMO) have advocated for a review of the current financial impacts of aggregates on municipal infrastructure and associated fee payments. The province should continue to undertake discussions with these organizations to determine if further review of licence fees should be undertaken and the recommended scope and process for the review.

   Previously, the Region of Peel recommended a review of fees to fund the preparation and implementation of comprehensive master rehabilitation plans. It is also recommended that the province consider the ability to collect and apply new special purpose fees for this purpose.

Further Considerations

1. Rehabilitation

   The Province should consider dedicating additional resources to improve enforcement of the ARA to encourage progressive rehabilitation. Although

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aggregates are considered an interim use, the duration of aggregate operations often extend over decades. There is a need for increased provincial oversight, inspection, review and enforcement of aggregate licences and site plans to ensure that an appropriate balance of progressive rehabilitation and extraction is achieved throughout the lifetime of an site from the commencement of the operation to the eventual surrender of the licence.

The Region encourages the Province to acknowledge the role and potential benefit of comprehensive rehabilitation planning in the ARA's regulatory framework, including a role for the Ministry to engage in and support comprehensive rehabilitation planning. Comprehensive rehabilitation planning will occur over a broad geographical area, and while the Provincial Policy Statement, 2014 applies to future licence applications within a comprehensive rehabilitation plan area, municipalities may wish to require participation from existing operators. Municipalities will require the support of the MNRF in order to allow existing rehabilitation provisions of licences to be amended in order to conform to a municipal comprehensive rehabilitation master plan.

2. Excess Soil

Rehabilitation of pits often involves importing clean fill. Regulation, oversight and enforcement by the Province for managing fill from construction projects is required. Further, complementary environmental regulation must be integrated with the ARA to ensure the proper management of fill. The Province is encouraged to ensure that there are no contradictory clauses between the definitions of aggregate, earth and topsoil versus soil under the proposed new On-Site and Excess Soil Management regulation.

3. Aggregate Recycling

The conservation of mineral aggregate resources, including through the use of accessory aggregate recycling facilities within operations, wherever feasible, is a requirement of the Provincial Policy Statement, 2014. While the Region supports aggregate recycling, the locating of accessory aggregate recycling facilities within licenced operations can have the unintended consequence of delaying the surrender of the licence for pits and quarries when extraction is complete, thereby delaying rehabilitation. There are also concerns that uncontrolled importation of materials can have unintended consequences including the potential to contaminate groundwater and sources of drinking water. The Province should ensure that aggregates recycling and rehabilitation policies address these concerns with provisions in licences and site plans to require appropriate siting and monitoring of recycled aggregate materials and provisions to require the phasing out of aggregate recycling operations and stockpiles when extraction is complete prior to the surrender of licences.

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Conclusion

I would like to thank you for the opportunity to provide the Province with comments on the proposed amendments to the *Aggregate Resources Act*. The proposed amendments will strengthen the aggregate resources policy framework and have direct benefits to municipalities.

Sincerely,

Adrian Smith, Director
Regional Planning and Growth Management Division
Public Works, Region of Peel
Tel: 905-791-7800 ext. 4047
Adrian.Smith@peelregion.ca

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November 27, 2019

Jamie Haldenby
Program Management Branch – Program Oversight
40 St. Clair Avenue West, 4th Floor
Toronto, ON M4V 1M2

Dear Mr. Haldenby,

Re: Changing the Mandate of the Resource Productivity and Recovery Authority

The Region of Peel thanks the Ministry of the Environment, Conservation and Parks for the opportunity to provide comments on the proposal to change the mandate of the Resource Productivity and Recovery Authority (ERO Number 019-0671).

In general, Peel supports the proposal to change the mandate of the Resource Productivity and Recovery Authority (RPRA). Peel also strongly supports RPRA's continuing role in oversight and enforcement.

Peel supports the province's efforts in gathering waste related data and has called for the province to collect better data.

Expanding RPRA's mandate to include digital reporting services, fee setting and cost recovery for waste outside of their current mandate improves the efficiency and accuracy of data and reduces the administrative burden for organizations, including municipalities, that manage these materials. It will also provide the province with access to much needed data.

Allowing RPRA to set and collect fees for digital reporting services for new programs they take on is reasonable to ensure these reporting services are performed adequately. The process to set these fees should be transparent and consider input from all stakeholders.

The proposal to amend the Waste Diversion Transition Act to allow the transfer of residual surplus funds left at the end of a program transition from an Industry Funding Organization (IFO) to RPRA is reasonable but these funds should be used in a manner that benefits Ontario's citizens and advances waste reduction and resource recovery in the province. To ensure this, the amount of funds remaining after a program transition should be published and the use of these surplus funds should be transparent and consider input from all stakeholders.

One of the most significant issues with the previous legislation was that Waste Diversion Ontario did not have the necessary resources or powers to adequately oversee IFOs.

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The new legislation and the establishment of RPRA addresses these issues. Peel is a strong supporter of RPRA's having a strong oversight and enforcement role and would caution against any changes that would diminish RPRA's role or powers of oversight and enforcement.

Sincerely,

Norman Lee
Director
Waste Management
Region of Peel

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November 26, 2019

André Martin
Compliance, Planning and Spills Action Centre
135 St. Clair Ave. West, 8th Floor
Toronto , ON
M4V 1P5

Re: ERO 019-0750- Holding polluters accountable by expanding the use of administrative monetary penalties for environmental contraventions

Dear Mr. Martin:

Thank you for providing us the opportunity to comment on ERO 019-0750- Holding polluters accountable by expanding the use of administrative monetary penalties for environmental contraventions. Region of Peel staff support the Ministry's proposal on funds collected from the newly introduced or expanded monetary penalties being designed to support local communities with their environmental improvement activities and the implementation of the Made-In-Ontario Environment Plan, and have a few comments on this legislative proposal.

Expanding Use of Administrative Penalties for Environmental Violations

Region of Peel staff generally support the intent of the legislative amendment that would expand the use of administrative monetary penalties (AMPs) for environmental violations to various legislative Acts. This change will help the Ministry of Environment, Conservation and Parks (the Ministry) to close the gap in the enforcement program for events of non-compliance with environmental legislation. Administrative monetary penalties not only increase compliance, they also reduce collection and court administration costs and are more efficient than other types of penalties.

When moving forward with implementation of this system, it is important that the Ministry issue AMPs for environmental violations in a consistent manner and that the established methodology be reliable and shall remove any opportunity for interpretation or discretion. Consistency should be achieved through regular calibration of penalty administration that considers different types of violations and their potential impact on the environment and/or public health. The Region would appreciate further consultation with Ministry on how the administration of the penalties would be introduced and enforced.

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Annual Reporting of Administrative Penalties in the Calendar Year

The regular reporting of AMPs for environmental violations supports transparency. While Regional staff are supportive of this in principle, it is suggested that the Ministry considers exempting the reporting of certain penalties. These would include penalties associated with findings of non-compliance that are administrative in nature and with no impact or no suspected impact on the environment or public health.

Maximum Penalty Scheme

Region of Peel staff ask that the Ministry consider modifying its proposal for maximum AMPs for environmental violations to replace the existing framework. The penalties set out in the current legislation, with provision for cumulative daily fine structure, have proven to be an effective compliance instrument for events where there is a long-term environmental impact (e.g. spill into waterways). Replacing these daily fines with administrative fines, which have a maximum cap, may not successfully deter or cease an enduring violation. It is therefore, recommended that the Ministry retains these daily fines in the various Acts that are being amended (Environmental Protection Act (EPA), Nutrient Management Act, 2002, Ontario Water Resources Act, Pesticides Act, Safe Drinking Water Act, 2002

Clarification on devolution of enforcement and administrative penalties

Currently enforcement and penalties under the EPA Part X Spills are the responsibility of municipalities. Region of Peel staff would like clarification on whether enforcement and penalties associated with violation/non-compliance with the mentioned Acts will remain with the province or if provision to devolve enforcement responsibilities to the municipal level of government is planned (like EPA Part X Spills). This would have a significant impact on local by-laws and enforcement programs as well as having human resource and financial implications.

Clarification on Current Abatement process

We also request clarification on whether changes are proposed to the current abatement process. This would be limited to where the response to a finding of non-compliance or a violation results in a Ministry order for specific action to restore or reduce the risk of adverse effects to public health or the environment, and to assess the control measures in place to prevent occurrence of events. It would be expected that the Ministry will assess the event and select the most appropriate

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enforcement method to cause action to mitigate the impacts of the violation and re-establish regulatory compliance before monetary penalties are applied.

Funding Program

The Region supports the use of the administrative monetary penalties collected under the various acts to support the creation of a fund that would be available to support local environmental improvement activities. As the Ministry moves forward with the implementation of this legislative proposal, it is recommended that the Ministry consult with municipalities and other stakeholders regarding the design of the fund including parameters such eligibility and allocation method.

Conclusion

Thank you for the opportunity to comment on the Ministry's legislative amendments regarding the expansion of environmental monetary penalties. If you have any questions, please contact Justyna Burkiewicz, Manager of Water and Wastewater compliance at justyna.burkiewicz@peelregion.ca

Sincerely,

Anthony Parente
General Manager, Water and Wastewater Divisions
Public Works
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November 26, 2019

Leo Luong, Manager
Water Policy Section
Ministry of the Environment, Conservation and Parks
40 St. Clair Avenue West, 10th floor
Toronto, ON
M4V 1M2

Re: Amendments to the Wells Regulation, ERO number 013-1513

Dear Mr. Luong:

We want to thank you for the opportunity to comment on the proposed amendments to the Wells Regulation (R.R.O. 1990, Regulation 903 under the *Ontario Water Resources Act*). Region of Peel staff do appreciate the Ministry's efforts to reduce the administrative burden on the well construction industry and align with current international standards, while maintaining protection for the environment, public health and safety and well owners. It is hoped that these modernizing requirements for well construction will achieve the desired benefits for municipalities and other stakeholders.

Region of Peel staff have recommendations to strengthen some of the proposed changes to the Wells Regulation as outlined in this letter.

Update Well Casing Standards: Provide clear and specific condition

It is recommended that the well casing standards include clear specifications for selecting well casing for high yield wells where impact on well performance and efficiency can be important. This would be an alternate to relying on well technicians to exercise professional judgement on the selection of casing. It is therefore suggested that every well contractor or well technician are licensed to be deemed a Qualified Person, as defined by the regulation.

Also, well casing should be properly described to match the requirements for well casing under the proposed draft "*Determination of Minimum Treatment for Municipal Residential Drinking Water Systems Using Subsurface Raw Water Supplies*", which the Ministry is planning to introduce in the coming months. If implemented, this change ensures all new municipal supply wells will have to be drilled and designed as Category 1 wells; wells that are deemed low risk and reliably supply source water of high physical and chemical quality.

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Allow Placement of Shallow Well Screens for Test Holes and Dewatering Wells

Region of Peel staff support allowing the placement of well screens shallower than 2.5 metres below the ground surface. Allowing the placement of shallow screens for test holes and dewatering wells is a helpful addition to the regulation. This will help the efforts of dewatering under construction where temporary shallow dewatering wells can be placed, a practice that is not currently permitted.

Other Recommended Change to the Wells Regulation

As your Ministry consults on its proposed changes to the Wells regulation, Region of Peel staff would like to take this opportunity to recommend a change to another part of the existing Wells Regulation.

In the spirit of modernizing requirements and aligning to current international standards, it is recommended that well contractors have the flexibility and choice to follow the American Water Works Association procedure for well disinfection. Currently, the contractors are restricted to adhering to the well disinfection procedure in the existing regulation.

If you have any questions, please contact Luis Lasso, Advisor, Water Resources Management at luis.lasso@peelregion.ca.

Sincerely,

Anthony Parente
General Manager, Water and Wastewater Divisions
Public Works
Region of Peel