



**“WEAO WILL BE THE PREEMINENT ORGANIZATION OF  
TECHNICAL AND PROFESSIONAL INDIVIDUALS  
DEDICATED TO THE PRESERVATION AND  
ENHANCEMENT OF ONTARIO’S WATER  
ENVIRONMENT”**

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July 16, 2010

Senior Policy Analyst  
Ministry of the Environment,  
Integrated Environmental Policy Division  
Land and Water Policy Branch  
135 St. Clair Ave, W.,  
Toronto, Ontario M4V 1P5

Attention: Carol Salisbury

Re: EBR 010-9940 Water Opportunities and Water Conservation Act, 2010

Dear Ms Salisbury;

The Water Environment Association of Ontario (WEAO) represents the wastewater sector in Ontario. Our membership is composed of municipalities, academia, engineering consultants, industry, and provincial and federal departments, all with a focus on wastewater management (municipal wastewater, storm water management, water reuse, and biosolids).

Our members are intimately involved with water and storm water management from urban and rural settings across Ontario. In addition many are actively involved in design and implementation of new technologies pertaining to systems and individual components.

We appreciate being included in the consultation process for issues related to the proposed Water Opportunities and Water Conservation Act, 2010. Being the owners/operators/equipment suppliers, and designers of sewage treatment plants and storm water facilities we are particularly interested in any actions that might have an impact on our members. Strengthening the environmental and economic position of Ontario in Canada and globally is a commendable goal.

There are a number of comments we would like to make based on the information provided for this EBR notice. These comments are included as an attachment.

In principle we support the proposed Water Opportunities and Water Conservation Act and hope that our comments may contribute to strengthening the Act through more emphasis on the management of wastewater and storm water than currently exists.



**40<sup>th</sup> ANNUAL TECHNICAL SYMPOSIUM & EXHIBITION**  
**APRIL 10-12, 2011**  
**THE WESTIN HARBOUR CASTLE HOTEL**  
**TORONTO, ONTARIO**



WEAO asks to be included in stakeholder discussions particularly since our members have relevant expertise and interest to assist in moving technology forward in Ontario, and improving management of wastewater and storm water.

Sincerely,

A handwritten signature in black ink, appearing to be 'Catherine Jefferson', written in a cursive style.

Catherine Jefferson  
Executive Director

Cc: D. Kemp, WEAO President  
WEAO Government Affairs

### **Comments on the proposed Bill 72 (Water Opportunities and Water Conservation Act, 2010)**

WEAO supports in principle, the objectives to:

- “foster innovative water, wastewater and storm water technologies and services in the private and public sectors”;
- to create opportunities for economic development and clean-technology jobs in Ontario”; and,
- “to conserve and sustain water resources for present and future generations”.

However we have some concerns, that if addressed, we feel could strengthen the proposed Act. We would also be pleased to discuss these with staff of the Ministries involved.

The major comments pertain to:

1. the proposal to develop a Corporation;
2. the emphasis on water conservation, with little mention of wastewater/storm water or water reuse;
3. funding to support e.g. water conservation;
4. terms that have not been defined or explained.

There is some concern that the formation of a Corporation will add additional bureaucracy and therefore impede rather than enhance actions to develop and promote new technology and service delivery. This could also imply additional reporting/paperwork for the municipalities. Excessive reporting is already overwhelming, in particular for small and medium sized municipalities.

The objects of the Corporation as outlined in the Explanatory Notes strike a chord with the Water Environment Association of Ontario as they echo our organization’s Goals ([www.weao.org](http://www.weao.org)). It would appear that duplication of effort is a possibility between our association and that of the new Corporation, which might leave confusion in the minds of municipalities and others, and dilute messages. We propose a discussion on this as soon as possible to ensure roles and responsibilities can be defined and we develop a clear message to municipalities.

There is an emphasis on water conservation throughout the proposed Act, but little reference or acknowledgement to water reuse (and consequent changes to the Building Code); wastewater management and/or storm water management technologies and services. Our Association is proof that there is considerable expertise within the province that could be tapped to move the “Open Ontario” agenda forward.

Municipalities may already have begun the development of water conservation plans, others not, due to resource limitations. Some municipalities may be identifying I&I as sources of excess water loss. How will the government ensure availability of equitable resources to assist the smaller/less advanced municipal programs?

Page 12 section 29 refers to “regulated entities” or a “class of regulated entities”. Do these apply to the existing municipal operations or those regulated only under the proposed new Act? What does “class” refer to?

There is mention of developing performance indicators and targets for services within municipalities. This suggests the need for some accreditation body. There is reference in section 35 (c) (ii) that parts of plans developed by municipalities be “certified” by “persons with prescribed qualifications”. We suggest that there be more discussion on this, as to what accreditation is proposed and by whom. Although this may provide another avenue of expertise Ontario could promote, clarification is required.