



November 9, 2020

Dr. George Jacoub, P.Eng.  
Water Research Scientist - Hydrologist  
Ontario Ministry of the Environment, Conservation and Parks  
Source Protection Programs Branch, Land and Water Division  
40 St. Clair Ave. W., 14<sup>th</sup> Floor  
Toronto, ON M4V 1M2  
Letter sent by email: [George.Jacoub@ontario.ca](mailto:George.Jacoub@ontario.ca)

Dear Dr. Jacoub,

**RE: ERO 019-2219 - Proposed amendments to the Director's Technical Rules made under section 107 of the Clean Water Act, 2006**

Ontario Pork represents the 1,180 farmers who market 5.5 million hogs in the province. The organization is engaged in many areas, including research, government representation, environmental issues, consumer education and food quality assurance. Ontario Pork is the first livestock commodity group in the province to set social responsibility benchmarks, demonstrating pork producers' commitment to sustainable farming. Ontario's pork industry "farm to fork" generates \$2.6 billion in economic output and 13,186 in full-time equivalent jobs.

We appreciate the opportunity to provide input on the proposed changes, as well as being able to speak with you on Thursday, November 5<sup>th</sup>. We understood from you during the meeting that Ministry of the Environment, Conservation and Parks (MECP) undertook consultations with other ministries and stakeholders in developing the proposed changes, and we are disappointed and concerned that agriculture commodity groups were not included in your consultations on the changes to the Technical Rules under the Clean Water Act, prior to their development.

We are also concerned that the proposed changes were provided in a very large document, which did not include track changes to be able to easily determine what the proposed changes are, nor was a regulatory impact assessment or statement provided outlining the impact of the proposed changes.

Ontario Pork has been actively engaged in provincial government consultations on many environmental issues and we remain open to, and appreciative of, opportunities to provide input on issues impacting our sector.

In terms of the proposed changes, we have several questions and comments, including:

- Section 15.1(4) gives the Source Protection Committee (SPC) the authority to use an alternate method or approach from that which is already prescribed. Similar concerns are noted for Section 55.1 whereby SPC's are provided the authority to reclassify an intake or planned intake.

- Why are changes being proposed and what is the expected outcome? How will potentially impacted landowners be notified and what will be the process for providing input into the changes? What is the complaint and appeal process if the SPC chooses to use an alternate approach?
- Will Director's approval still be required? If yes, we recommend that this be made clear.

We also wish to raise the issue of financial assistance for the agricultural community for implementations included in the Clean Water Act, as the proposed changes do not address this. Whether implementation assistance is provided through this program or other means, it must be provided.

We hope that our recommendations and observations will be given due consideration in this consultation and that further consultation and discussions occur prior to the Ministry moving forward on this issue.

Sincerely,



Eric Schwindt  
Board Chair