November 22, 2019

For your consideration,

Reference: Modifications to Ontario Regulation 903

The Regional Municipality of Waterloo – Water Services (Region) would like to provide a comment on proposed changes to Ontario Regulation 903. While we offer no concerns with the changes to the regulation as proposed, we have another suggested regulatory change that should be considered.

There are cases where municipal staff need to complete maintenance work on their own wells that currently require staff to be a Well Technicians employed by a Well Contractor. These instances include activities typical of Class 5 well technicians including small repairs or extensions to monitoring wells where casing has been broken, or to install permanent datalogging equipment into municipal supply wells. To obtain a Well Contractor Licence, the regulation requires that a director, officer or partner must write an exam testing their knowledge of the Wells Regulation. While this is likely not an issue for small companies where the owners are well technicians, it can be a significant burden for municipalities or agencies and larger firms with multiple business lines and where senior management (CEO’s, Town clerks, etc.) are unlikely to have knowledge of well regulations. For these larger organizations, the requirement for senior management to write an exam is a sufficient enough burden that many organizations opt not to get a Well Contractor Licence. This carries more significance in remote communities where Well Contractors may not be available locally.

To remove this burden on larger organizations, Region staff propose the regulation be further amended to allow water professionals listed in section 1.0.3 of the Regulation (i.e. P.Geo, P.Eng, CET’s) hold responsibility for complying with the well regulations, write the Well Contractor Licence exam, and hold the well contractor licence instead of senior managers.

Please consider these comments.

On behalf of the Regional Municipality of Waterloo - Water Services