

Christopher Manning
Client Services and Permissions Branch
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Dear Christopher,

Thank you for providing the opportunity to comment on the new Drinking Water Quality Management System 3.0 draft. The City of Barrie Water Operations branch has provided the following comments.

Element 12 – Communications

The revised structure of this element emphasizes the importance of identifying and communicating relevant aspects of the Quality Management System among Top Management, the Owner, the Operating Authority, suppliers, the public, and external service providers.

In practice, direct communication between all parties may not always occur; instead, information is often relayed indirectly, particularly through Top Management. We seek clarification on whether DWQMS 3.0 permits such indirect communication, provided it ensures that all parties receive the necessary information effectively.

Element 16 – Sampling Testing and Monitoring

Plan d) under the DWQMS 3.0 mandates the operating authority to audit the practices used to summarize monitoring data and generate exception reports that demonstrate compliance with legislated requirements.

Currently, we use eRIS Software to generate various reports, including a Sampling Report Book that summarizes regulatory sampling results. Developing a separate exception report that isolates only non-compliant data would present a significant administrative burden.

Caution is advised, as a defined exception report may unintentionally prescribe methods for achieving compliance – which goes beyond the intended scope of defining what must be achieved.

Element 18 – Emergency Management

Plans c) and d) under the DWQMS 3.0 require the operational plan document procedures for emergency response training and testing requirements, (including frequency, scope, and post-testing review of response effectiveness).

We seek clarification on whether DWQMS 3.0 permits emergency response processes to be tested during actual emergency events, or if testing must be conducted through simulated or mock scenarios. Given that real emergency events occur annually- or even more frequently- leveraging these events to fulfill testing requirements would be both practical and beneficial.

Sincerely,

City of Barrie – Water Operations Compliance Team

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