

By Email

May 26, 2025

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RE: Toronto Water comments on the proposed changes to the Drinking Water Quality Management Standard – DWQMS DRAFT Version 3.0

Thank you for giving us the opportunity to review the proposed changes to the DWQMS DRAFT Version 3.0. Please see below Toronto Water's comments for your review and considerations.

Element 9: organizational structure, roles, responsibilities and authorities

- **Proposed changes:** MECP updated PLAN c) and d) to identify the ***role and/or job title of*** person(s) responsible for undertaking the management review and people having top management responsibilities
- **Toronto Water's comments:** What is the rationale for this change? It would be helpful if the Ministry provides the rationale for this update, which should clarify to Municipalities and other stakeholders, what risk is being addressed with this new update OR what value it is adding to the Management Review process?

Element 10: competencies

- **Proposed changes:** MECP updated PLAN a) to specifically include ***any mandatory licensing, certification or training requirements.***
- **Toronto Water's comments:** It seems that the information presented during the 2025 DWQMS workshop is more stringent than the proposed changes to the standard. We need the MECP to provide a clear definition of competencies and what must be included as part of the required competencies. Our operators (i.e. personnel performing duties directly affecting drinking water quality) have certification, and we consider that having a certificate means they are competent.

Element 11: personnel coverage

- **Proposed changes:** MECP updated PLAN to identify specific scenarios - as identified under a), b) and c) below - that must be considered, at a minimum, in the procedure for

personnel coverage. Proposed changes are shown in bold/italic text below:

PLAN – The Operational Plan shall document a procedure to ensure that sufficient personnel meeting identified competencies are available for duties that directly affect drinking water quality. ***The procedure shall consider:***

- a. periods of routine operation, including weekdays, weekends, and statutory holidays***
 - b. labour disruptions (i.e., strike or lockout)***
 - c. emergency situations***
- **Toronto Water’s comments:** We suggest MECP to make the change from “The Operational shall document **a procedure...**” to “The Operational shall document **procedures ...**”; this way the required information listed under a), b), and c) can be addressed in multiple documents and formats, including schedules.

Element 12: communications

- **Proposed changes:** MECP updated PLAN d) to replace the requirement to communicate on the relevant aspects of the QMS to essential suppliers identified under Element 13 with a broader requirement to communicate on the QMS to ***“External service providers and suppliers”***.
- **Toronto Water’s comments:** The proposed update under d) replaces the specific requirement to communicate relevant aspects of the QMS to “essential suppliers” with a generic and broader requirement to communicate relevant aspects of the QMS to “External service providers and suppliers.”:
 1. Will Operating Authorities be required to communicate on their QMS to “any external service provider and supplier” including non-essential ones? Ministry to provide the rationale for this change, including the value added.
 2. This change will just add more administrative burden with no value added. It will also confuse a lot of suppliers for no reason. We suggest “no change” to the existing requirement.

Element 16: sampling, testing and monitoring

- **Proposed changes:** MECP added PLAN d) as follows: The Operational Plan shall document: d) a procedure for preparing exception reports that conforms to the applicable best management practices published or endorsed by the Ministry of the Environment, Conservation and Parks, where exception reports are used to demonstrate compliance with sampling, testing, and monitoring requirements.
- **Toronto Water’s comments:** Where can municipalities find the applicable best management practices published or endorsed by the Ministry? Are these best practices already available? If not, the proposed change should be put on hold and the Ministry should give municipalities certain time for the implementation when these best practices are published. Additionally, more clarifications are needed about the meaning/definition of “exception reports” in this context.

Element 17: measurement and recording equipment calibration, verification and maintenance

- **Proposed changes:** MECP updated PLAN to include verification, in addition to calibration and maintenance as follows:

PLAN – The Operational Plan shall document a procedure for the calibration, **verification** and maintenance of measurement and recording equipment.

- **Toronto Water’s comments:** We suggest changing the wording to “calibration, verification and/or maintenance”

Element 20: management review

- **Proposed changes:** MECP added DO e), requiring that relevant outcomes of the management review are communicated to operating authority personnel.
- **Toronto Water’s comments:** We need the Ministry to provide a definition of operating authority personnel.

If you have any questions, please contact the person who made this submission on our behalf.

Sincerely,



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