

June 3, 2025

Submitted online and via email to christopher.manning@ontario.ca

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Ministry of the Environment, Conservation and Parks
Client Services and Permissions Branch
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RE: Updates to the Drinking Water Quality Management Standard

The City of Guelph (the "City" or "Guelph") appreciates the opportunity to provide feedback on the proposed updates to Ontario's Drinking Water Quality Management Standard (DWQMS), which sets out the criteria for quality management for Operating Authorities of municipal drinking water systems. The majority of the proposed amendments are minor or administrative in nature, however, the City would like to provide feedback on the amendments under the following two elements:

Element 10 (Competencies):

Element 10 of the DWQMS sets out the processes that Operating Authorities must have in their Operational Plan that ensure the competencies of staff performing duties that directly affect drinking water quality. The proposed amendments would require Operating Authorities to document the specific mandatory licensing, certification, or training requirements for staff.

The intent of this requirement appears to focus on the certification of drinking water operators rather than the licensing or certification requirements for skilled trades professionals working within the drinking water system who do not necessarily perform operational duties (e.g., millwrights, electricians, instrument technicians). However, when these skilled trades professionals do undertake operational duties, they must obtain the appropriate water operator certification.

If the intent is solely to address drinking water operator certification, it is recommended that the term "licensing" be removed, as drinking water operators in Ontario are "certified" under O. Reg. 128/04, not licensed. Wastewater operators, on the other hand, are licensed under O. Reg. 129/04. Removing "licensing" would improve clarity and ensure alignment with existing regulatory terminology.

Element 16 (Sampling, testing and monitoring):

Element 16 of the DWQMS sets out the procedures that Operating Authorities must have in their Operational Plan with respect to sampling, testing, and monitoring of the drinking water system. The proposed

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amendments would add a requirement for Operating Authorities to have a procedure in place for preparing "exception reports", where exception reports are used to demonstrate compliance with sampling, testing, and monitoring requirements.

The term "exception report" is not commonly used in drinking water compliance. As a result, the City is seeking clarification on the definition and use of "exception reports".

Additionally, this amendment references best management practices (BMPs) developed or endorsed by the Ministry of the Environment, Conservation and Parks (MECP), which the "exception reports" would have to conform to. However, since such BMPs have not yet been endorsed or established, the implementation timeline remains unclear. Should operating authorities develop procedures for exception reports immediately, or only once BMPs are officially developed or endorsed? Further clarification is needed on whether the forthcoming BMP will explicitly define "exception report" and provide guidance on its use.

Clarification on these points would support effective conformance with the DWQMS and ensure Operating Authorities can interpret and apply the requirement appropriately.

Closure:

We appreciate this opportunity to provide input on this proposal. Should you have any questions about the feedback provided, or require additional details please do not hesitate to contact the City at intergovernmental.relations@guelph.ca.

Sincerely,

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