



June 3, 2025

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Ministry of the Environment, Conservation and Parks (MECP)
Client Services and Permissions Branch
135 St Clair Ave West, 1st Floor
Toronto, ON, M4V 1P5

Re: Updated Drinking Water Quality Management Standard (ERO 019-8413)

Public Works

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peelregion.ca

Peel Region appreciates the opportunity to comment on the Updated Drinking Water Quality Management Standard (DWQMS). Peel Region staff reviewed this proposal and have raised some questions and offer the following comments for your consideration. Although proposed changes apply to select sections of the DWQMS, our feedback also includes recommendations to other areas of the document.

Introduction

In the Guidance Document section, reference is made to a comprehensive guidance document *Implementing Quality Management: a Guide for Ontario's Drinking Water Systems* and instruction to access this guidance material through the MECP website. Access to this document is not readily available through the link provided as this document appears to have been archived. Instead, 'Ontario's Drinking Water Quality Management Standard – Pocket Guide' is available and provides a high-level overview of the DWQMS requirements and their application to a drinking water system.

Element 5 – document and records control

The process to manage the documentation needed by the QMS must reflect the controls that ensure documents are kept up to date. Changes in operations, whether triggered by the operating authority or by changing legislation and regulations, are captured through document updates and, to achieve conformance, it is recommended that document version control is considered as an added value to the procedure (PLAN section).

It is also recommended that the established procedure is made to apply to any relevant records necessary to demonstrate conformity with this standard, and not be limited to outcomes of the internal and external audits and management reviews.

Element 7 – risk assessment; AND Element 8 – risk assessment outcomes

Cybersecurity is a new risk that water systems are required to consider, and there is a dearth of guidance or recommendations from MECP on this topic. Does the MECP intend to provide guidance on best management practices for cybersecurity in municipal drinking water systems?

Peel Region staff ask that the MECP review the process for assessing risk for hazardous events that rank with high consequence but low likelihood. While these events have a low probability of occurring, when they do happen, their high impact can cause significant risk and widespread disruption to the drinking water supply. The DWQMS should therefore include a requirement under Element 8 to test these events through an emergency response testing exercise. Being unprepared could result in a higher



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consequence outcome than if the event response were planned and tested. The testing exercise might also reveal that the actual consequence is higher than the predicted risk rank. These situations could be catastrophic.

Risk should be directly tied to emergency management (Element 18). Currently, these do not reference each other.

Element 9 – organizational structure, roles, responsibilities and authorities

Description of the organizational structure of the Operating Authority should include roles and responsibilities relevant to the operation and performance of the drinking water system and the effectiveness of the quality management system. It is therefore recommended to clarify this expectation in Element 9 PLAN a).

Element 11 – personnel coverage

The proposed change includes consideration of staff shortage (labour disruptions) that can impact normal operation of the drinking water system. With recent amendments to the Ontario Regulation 128/04 and requirements for strike and lock-out procedures and plans, it should be made clear that this addition would be complementing the regulatory obligation, not to be construed as a duplication of effort.

Element 12 – communications

Update to this section may create confusion about MECP's expectations. Communication between the entities listed may be interpreted as a two-way collaborative exchange of information, where the intent of this procedure is for aspects of the quality management system to be communicated to the interested parties, including those listed a) to e). Reference to Element 13 has been removed, and it is recommended that, at the minimum, external service providers and suppliers identified as essential receive this communication.

The term 'supplier' is defined in the DWQMS and it should therefore read 'Supplier'.

Element 14 – review and provision of infrastructure

To ensure funding is available for all situations (planned and unplanned), it is recommended to add consideration to the outcomes of the emergency response testing documented under Element 18. This would naturally align with the recommendation related to Element 8 above.

Element 16 – sampling, testing and monitoring

In Element 16 (d), MECP is proposing changes that will enable auditing of practices used to summarize monitoring data, where such reports are used to demonstrate compliance with legislated requirements. This feels duplicative, since MECP Inspectors already review compliance monitoring data summaries and reports. What is the intention of this change? Is it to empower DWQMS auditors to issue Best Management Practice (BMP) Recommendations for the format in which data is displayed/provided to make it more user-friendly for MECP Inspectors?

Does this include an audit of records used to demonstrate compliance with custom regulatory relief conditions within the Municipal Drinking Water Licence?



The new DWQMS statement refers to conformance to MECP published or endorsed BMPs. Will a list of these resources be provided (with links to them online)?

Element 18 – emergency management

Peel Region staff recommend that this element reference high risks identified in Element 7. The DWQMS should make it mandatory that high risks be documented in an established emergency plan/protocol. As noted above for Element 8, focus on mandatory testing of potential emergency situations for risks with high consequence and low likelihood should be included.

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MECP guidance documentation is needed around opportunities to field-test emergency situations in a collaborative setting, including various levels of government and industry agencies.

Peel Region staff recommend that the DWQMS require the Operating Authority to assess the effectiveness of the emergency response plan at least once every 36 months.

Element 20 – management review

Could the MECP please clarify the meaning of bullet point 2 in the summary of changes to DWQMS, "*clarified plan d), now plan e), requiring that updates to assumptions used in the risk assessment process are considered as part of the management review*"? Does this mean that any new or changed risk ranks need to be communicated during management review?

Peel Region staff suggest the MECP consider amalgamating (current Element 20 item m) "resources needed to maintain..." and (current Element 20 item k) "changes that could impact..." with Element 21 Continual Improvement. They all feed into each other and it can get confusing when reporting on them separately. To avoid triplicate repetition, Peel Region has amalgamated these 3 items in our management review report.

Element 21

Continual Improvement should also connect to Element 20, items k and m, as mentioned in our comments under Element 20.

CONCLUSION

Peel Region appreciates the Ministry's efforts to maintain an updated and clear Drinking Water Quality Management Standard.

If you have any questions or require more information, please contact me at elvis.oliveira@peelregion.ca.

Kind Regards,



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