



December 1, 2025

Ministry of the Environment, Conservation and Parks  
Client Services and Permissions Branch  
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## Public Works

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peelregion.ca

### **Re: Updates to the Director's Directions: Minimum Requirements for Operational Plans (ERO 025-0779)**

Attention: Christopher Manning

Peel Region appreciates the opportunity to comment on the consultation for *Updates to the Director's Directions: Minimum Requirements for Operational Plans*.

Peel Region staff is generally supportive of the proposed updates and offer the following questions and comments for consideration.

#### **PEEL REGION STAFF COMMENTS**

### **3.0 Operational Plans – Content Requirements**

#### **Section 3.0.5**

Since section 3.0.5 applies to multiple subject systems that have different owners, then bullet 3 should reflect 'the owners' of all subject systems for which a single operational plan is prepared.

It is unclear if conditions for a single operational plan require that all 3 criteria be satisfied. If that is the intent, then bullets 1 and 2 should end with “and” to make this clear.

### **5.0 Public Disclosure of Operational Plans**

#### **Section 5.0.4 (1)**

Considering the significant increase in security/cyberattacks on water utilities, system owners should be encouraged to consider organizational protection and whether posting information on the website risks providing information that forms a target for bad actors and cybercriminals to identify vulnerabilities that could help them infiltrate the system.

### **Schedule A Definitions**

The definitions of **subject system** and **operational subsystem** contradict each other, both within Schedule A and within the Drinking Water Quality Management Standard itself.



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Schedule A defines **subject system** to have the same meaning as defined in the Drinking Water Quality Management Standard, which defines **subject system** as:

- a municipal residential drinking water system where the system is operated by one operating authority
- an **operational subsystem** where two or more parts of a municipal residential drinking water system are operated by different operating authorities

For reader clarity, we recommend adding “or” after the first bullet, to avoid confusion of interpreting this as both conditions apply.

Schedule A defines **operational subsystem** as

*a part of a municipal residential drinking water system operated by a single operating authority and designated by the owner within operational plans as being an operational subsystem.*

Note that this definition matches that within the Drinking Water Quality Management Standard, with the only difference being the addition of the words “within operational plans”.

This contradiction, shown underlined, challenges the reader in understanding the meaning of these terms. If we understand **subject system** correctly, its second bullet as defined in the Drinking Water Quality Management Standard should be amended to:

- a municipal residential drinking water system comprised of two or more parts that are operated by different operating authorities, where each part, designated by the owner within operational plans as being an **operational subsystem**, is operated by one operating authority.

## CONCLUSION

Peel Region appreciates the efforts of the Province to provide flexibility to organizations operating multiple connected municipal residential drinking water systems while maintaining environmental protection. We ask that our comments be considered when finalizing the Director’s Directions.

If you have any questions or require more information, please contact me at [justyna.burkiewicz@peelregion.ca](mailto:justyna.burkiewicz@peelregion.ca).

Kind Regards,

DocuSigned by:

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