



Office of the Mayor  
The Corporation of the Town of Aylmer  
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February 19, 2026

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Re: Aylmer Council Concerns – *Water and Wastewater Public Corporations Act, 2025*

The Town of Aylmer appreciates the Province's efforts to unlock growth in communities and accelerate economic investment. We acknowledge that the *Water and Wastewater Public Corporations Act, 2025, S.O. 2025, c. 14, Schedule 16*, represents an important piece of legislation from which many municipalities may benefit.

Aylmer Council has reviewed the potential impacts of this legislation on our community and has concluded that the establishment or advancement of a public corporation does not make sense for Aylmer at this time. We are proactively advancing these concerns in recognition that public corporations may be appropriate elsewhere in Elgin County, and we are supportive of such initiatives proceeding where they are locally beneficial.

Council's concerns relate primarily to the wastewater system. The following points summarize why inclusion in a broader public corporation is not appropriate for Aylmer's system:

- In early 2022, the Town undertook a preliminary analysis of interconnecting wastewater systems through a pipeline to St. Thomas or Central Elgin. This review determined that the cost of such a pipeline, along with the required pump stations and related infrastructure, would be prohibitive given the distances involved, relative elevations, and significant geographic constraints. In all foreseeable scenarios, maintaining Aylmer's wastewater treatment system as an independent system remains the most cost-effective approach.
- Aylmer has existing agreements in place for wastewater servicing for the Ontario Police College and for servicing the Township of Springfield in Malahide Township. The Town is confident in its ability to continue supporting neighbouring municipalities. Expanded servicing remains an important matter that is expected to be fully addressed through future boundary adjustment negotiations.
- The Town appreciates the significant provincial grant funding and investments recently made in Aylmer's water and wastewater systems. Even if current record levels of provincial funding were to decline, Aylmer has a sufficient user base to reasonably support future expansions and capital investments.
- Aylmer has been highly effective in managing operational costs related to the lagoon system. The Town has concerns that transitioning to a public corporation would result in increased operating costs, reduced responsiveness, and diminished effectiveness in system management.



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- The Town has demonstrated strong capacity to deliver large-scale water and wastewater capital projects using in-house expertise, as well as to undertake long-term planning necessary to support growth.
- Council has concerns that the introduction of a public corporation would centralize decision-making outside the local community, resulting in unnecessary bureaucracy, additional red tape, and reduced responsiveness to local needs and issues.
- The Town routinely benefits from favourable tender outcomes by advancing projects efficiently and tendering early. Council is concerned that inclusion in a public corporation would impede this approach and likely lead to less efficient project delivery and poorer outcomes for the local system.

With respect to the water system specifically, the Elgin Primary Water Board already operates in a manner similar to a public service corporation. Aylmer recognizes that, as a relatively smaller user of the Primary Line, its influence within that structure is limited. However, should the Province consider changes to secondary water lines under the *Water and Wastewater Public Corporations Act, 2025*, the Town requests that shares of the Aylmer Area Secondary Water Line be allocated based on existing and projected usage. This is particularly important given that Aylmer represents over 95 percent of the allocations on the Aylmer Area Secondary Line.

In summary, Aylmer Council believes that the *Water and Wastewater Public Corporations Act, 2025* will provide meaningful benefits to many municipalities, including potentially those elsewhere in Elgin County. However, Aylmer's wastewater system is expected to remain independent well into the foreseeable future. Both the wastewater and local water systems are well managed, financially sustainable, and capable of expansion through existing agreements with the Ontario Police College and the Township of Malahide.

As a result, Aylmer Council is of the view that there is no need to "fix" a system that is not broken—particularly where the creation of a public corporation could introduce unnecessary bureaucracy, delays, and increased costs without corresponding benefits to the community.

The Town of Aylmer remains committed to open communication and constructive collaboration with the Province and our municipal partners. We welcome continued dialogue and are prepared to share our local perspective to help ensure the best outcomes for our community and the broader region.

Respectfully,

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Jack Couckuyt  
Mayor Town of Aylmer