

May 1, 2026

Submitted online and via email to [Localgov@ontario.ca](mailto:Localgov@ontario.ca)

Ministry of Municipal Affairs and Housing  
Local Government Policy Branch  
13th Flr, 777 Bay St  
Toronto, ON M7A 2J3

**RE: Proposed amendments to the Water and Wastewater Public Corporations Act, 2025 and consequential amendment to the Safe Drinking Water Act, 2002**

The City of Guelph (the “City” or “Guelph”) appreciates the opportunity to provide feedback on the proposed amendments to the *Water and Wastewater Public Corporations Act, 2025* as part of Bill 98 – the *Building Homes and Improving Transportation Infrastructure Act, 2026*.

Overall, the City supports the intent of the amendments to ensure that public trust, water safety, and employee protections are maintained through changes in water and wastewater system operations. However, there remain opportunities to further strengthen this legislation and align it with existing source protection instruments. Below, you will find the City’s additional comments regarding the proposed legislative amendments.

**Amendments to the Water and Wastewater Public Corporations Act, 2025:**

The City of Guelph appreciates the inclusion of additional language to ensure that water and wastewater public corporations remain publicly owned. This is key to ensuring that water and wastewater services will not become a commercial commodity, and supports the outcomes of the Walkerton Inquiry which aims for accountability, local decision making, transparency and public oversight of drinking water systems.

Although the City is not subject to this proposal, the City is concerned about the proposed limitations on the transfer of municipal debt to public water and wastewater corporations. In the absence of rate-based funding available to municipalities following the transfer of water and wastewater services, these limitations may result in municipalities having to service these debts through increased property taxes.

While the City recognizes that the application of the *Water and Wastewater Public Corporations Act, 2025* (The Act) would be largely informed by yet-to-be-released regulations, there are several areas where the City sees opportunities to strengthen public accountability and water protections:

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- The Act (or subsequent regulations) would greatly benefit from additional limits and guidance to support greater accountability from public water and wastewater corporations. This includes limitations and prescriptions around governance structure, public reporting and transparency, and requirements for alignment with local water and wastewater master planning.
- The Act in its current form does not refer to the *Clean Water Act, 2006*, source protection plans or planning. This may indirectly impact municipal drinking water sources if the newly created public water and wastewater corporations are not appropriately involved and held accountable by Source Protection Committees.

### **Amendments to the Safe Drinking Water Act, 2002:**

The City supports the proposed amendments to the *Safe Drinking Water Act, 2002*, which would ensure that these new public corporations are held to the same legislative standards as municipally owned systems. This ensures that Ontario's drinking water is managed and protected from existing and future drinking water threats, and allows for the transferring of required licencing and protection of public safety with emphasis on the multi-barrier approach to drinking water safety.

### **Closure:**

Overall, the City recognizes that the focus of this new legislation is mainly to consolidate water and wastewater provision responsibilities where these are currently split between areas of upper and lower tier government and to align with areas where provincial projects of significance are planned. Based on this scope, and the City being a single tier municipality already responsible for the provision of water and wastewater, the City will continue to monitor the planned implementation of public water and wastewater corporations in Peel Region and other defined areas of the province, and assess the impacts of this organizational model for future consideration.

The City appreciates the opportunity to comment on these proposed legislative amendments, and looks forward to working closely with the province to support future regulations which would shape the implementation of this new approach. Should you have any questions, please do not hesitate to contact [intergovernmental.relations@guelph.ca](mailto:intergovernmental.relations@guelph.ca).

Regards,

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