

May 13, 2026

Local Government Policy Branch
777 Bay St., 13th Flr.
Toronto, ON M7A 2J3

REFERENCE:

ERO 026-0301: Proposed amendments to the Water and Wastewater Public Corporations Act, 2025 and consequential amendment to the Safe Drinking Water Act, 2002

Please accept the following as Oxford County's Submission of Comments in response to the proposed changes posted for public consultation on the Environmental Registry of Ontario (ERO 026-0301).

Background

Oxford County (the County) is a two-tier municipal government located in southwestern Ontario comprised of eight area municipalities: the City of Woodstock, Town of Ingersoll, Town of Tillsonburg and the Townships of Blandford-Blenheim, East Zorra-Tavistock, Zorra, South-West Oxford and Norwich.

The County is the owner and operator of all 17 municipal drinking water systems and 11 municipal wastewater systems which includes, but is not limited to, approximately 750 km of distribution watermains, 32 water treatment plants, 42 water reservoirs/storage towers, 7 water booster stations, 63 active groundwater supply wells, 635 km of sewers and forcemains, 38 sewage pumping stations, 9 wastewater treatment plants, SCADA systems, 4 bulk water stations and a biosolids management facility.

The County holds full municipal authority and is responsible for all water and wastewater system services, including water treatment, wastewater treatment, water distribution and wastewater collection, as per Section 11(11) of the *Municipal Act, 2001*.

Overview

Oxford County appreciates the opportunity to provide comments regarding the proposed amendments to the Water and Wastewater Public Corporations Act, 2025 (WWPCA) and the associated amendment to the Safe Drinking Water Act, 2002 (SDWA). The County acknowledges that the current proposal is intended to support the establishment of a Water and Wastewater Public Corporation (WWPC) model initially within Peel Region and appreciates

that several concerns raised through the earlier Environmental Registry of Ontario posting (ERO 025-1098) have been partially addressed through the current amendments.

Oxford County recognizes and supports the Province's efforts to:

- Explicitly prohibit private ownership of water and wastewater public corporations;
- Clarify that municipal drinking water systems owned by WWPCs remain subject to the SDWA requirements applicable to municipal drinking water systems;
- Preserve continuity of existing contracts, collective agreements, employment arrangements, and related employee protections during any transfer process; and
- Clarify that municipal debt associated with Peel Region water and wastewater services will not automatically transfer to a new corporation.

These amendments help address concerns related to public ownership, labour continuity, and regulatory oversight. However, despite these improvements, significant concerns remain regarding governance, accountability, long-term financial impacts, municipal authority, and the broader applicability of this model across Ontario municipalities.

Oxford County continues to recommend that any broader implementation of this governance model be approached cautiously and only after further consultation, transparency, and legislative clarity are provided.

Comments

Regional Governance and Long-Term Service Planning

Oxford County remains concerned about the long-term implications of transferring water and wastewater governance away from upper-tier municipalities or integrated regional systems. Regional service delivery models were established to support economies of scale, coordinated infrastructure planning, and the efficient sharing of specialized staff, equipment, and technical expertise across multiple municipalities.

Oxford County currently owns and operates all municipal drinking water and wastewater systems within its eight area municipalities. This integrated model allows the County to coordinate infrastructure investments, operational planning, source water protection, SCADA systems, asset management, emergency response, and regulatory compliance across interconnected systems and communities.

The proposed WWPC model introduces uncertainty regarding how these integrated services and responsibilities would be maintained in the future, including:

- Long-term infrastructure planning and growth coordination;
- Asset management and lifecycle funding strategies;
- Cross-departmental coordination with roads, stormwater, and development planning initiatives;
- Source water protection and associated risk management programs;
- Sewer use, conservation, and backflow prevention enforcement programs.

Water and wastewater systems are designed and managed on multi-decade planning horizons. Governance changes that fragment service delivery or introduce separate corporate oversight structures may create risks to long-term coordination, particularly in municipalities with interconnected systems or infrastructure that crosses municipal boundaries.

The County also remains concerned that the proposed framework appears to prevent future reversion back to a regional governance structure should the model prove ineffective or financially unsustainable over time.

Governance, Accountability, and Ministerial Authority

While the updated proposal provides greater clarity regarding public ownership and employee continuity, substantial concerns remain regarding governance oversight and the authority granted to the Minister.

The proposal would permit the Province to establish similar structures in other municipalities in the future, yet there remains limited clarity regarding:

- The criteria or decision-making framework that would be used to determine where and when this model may be imposed;
- Whether municipalities would have access to an appeal, dispute resolution, or mediation process;
- The extent of Ministerial authority regarding rates, financial planning, borrowing, or infrastructure investment decisions; and
- The extent to which municipal councils would retain oversight and accountability for decisions affecting local residents.

Although the proposal confirms that new corporations must remain publicly owned, public ownership alone does not fully address accountability concerns. Municipal water and wastewater services are directly accountable to elected councils and residents through established municipal governance processes, public budgeting, open meetings, and municipal transparency legislation.

Under a corporate governance model, accountability mechanisms become less clear. Concerns remain regarding:

- Potential reductions in local council oversight;
- The role and authority of appointed Boards of Directors;
- Public transparency requirements and applicability of municipal privacy and access legislation;
- The process for establishing water and wastewater rates;
- Whether performance metrics could prioritize financial outcomes over public service objectives; and
- The process for residents or municipalities to challenge decisions or service outcomes.

The County believes additional legislative and regulatory clarity is required before broader implementation of this model is considered elsewhere in Ontario.

Financial and Operational Impacts

Oxford County remains concerned about the financial implications associated with transferring water and wastewater governance structures.

Although the current proposal addresses Peel Region debt transfer concerns, broader questions remain unresolved regarding:

- Responsibility for transition costs;
- Impacts on water and wastewater rates;
- Future capital funding obligations;

- Development charge funding structures;
- Asset ownership and replacement liabilities; and
- Long-term infrastructure investment planning.

Water and wastewater infrastructure represents one of the most significant municipal asset classes in Ontario. Transitioning governance structures without clear financial frameworks may create uncertainty for municipalities, residents, and future infrastructure investment planning.

There are also operational concerns regarding implementation timelines and workforce stability. Large-scale governance transitions can create uncertainty for operational staff, potentially impacting retention of licensed operators, technical specialists, and institutional knowledge that are critical to maintaining safe and reliable water and wastewater services.

Oxford County also notes that implementation complexity may vary significantly between municipalities depending on system integration, shared infrastructure, growth pressures, and existing operational models. A standardized approach may not adequately account for these local differences.

Conclusion

Oxford County appreciates the Province's efforts to address several concerns identified through the earlier consultation process, particularly regarding public ownership protections, employee continuity, and clarification under the Safe Drinking Water Act.

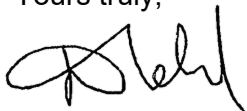
However, the County continues to have significant concerns regarding the broader implications of the proposed Water and Wastewater Public Corporation model, particularly with respect to governance accountability, Ministerial authority, financial impacts, long-term infrastructure planning, and the potential fragmentation of integrated regional water and wastewater systems.

The County strongly recommends that:

- Additional legislative and regulatory details be released for further public consultation;
- A clear decision-making and appeals framework be established prior to broader implementation;
- Municipalities retain meaningful oversight and accountability mechanisms; and
- Further stakeholder engagement occur with upper-tier municipalities, water system owners, operators, and industry professionals before expansion of this model elsewhere in Ontario.

Oxford County appreciates the opportunity to provide comments on the proposed legislative amendments and looks forward to continued engagement with the Province regarding the future governance of municipal water and wastewater services in Ontario.

Yours truly,



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