

May 14, 2026

Intergovernmental Relations and Partnerships Branch  
13th floor, 777 Bay St  
Toronto, ON, M7A 2J3  
irpb-mmah@ontario.ca

Attention: Honourable Rob Flack, Minister of Municipal Affairs and Housing (MMAH) and Honourable Todd J. McCarthy, Ministry of the Environment, Conservation and Parks

***Re: ERO No. 026-0302: Communal drinking water and wastewater system municipal consent requirements***

On behalf of Cortel Group, we are writing to address ERO Submission No. 026-0302, which is proposing legislative changes under the proposed the *Building Homes and Improving Transportation Act, 2026* to encourage greater adoption of non-municipal communal water and wastewater systems to support new housing development.

Communal Water and Wastewater systems have been used quite extensively throughout the Province of Ontario and beyond and we are supportive of these systems.

Communal Water and Wastewater systems offer significant benefits, including:

- Any application for a communal water/wastewater system needs to go through a rigorous review at the Ministry of Environment, Conservation and Parks to ensure that they meet and exceed all Ministry regulations when it comes to effluent quality, noise and odour.
- Communal Systems can be either privately owned or assumed by a Municipality.
- These systems often do not require the presence of a large water body for effluent discharge.
- Effluent can be used for fertilization, groundwater discharge, non-potable uses such as irrigation for parks, golf courses etc.
- The system units take much less time to install-- They are generally constructed in manufacturing plants, delivered and ready to install on-site making them more cost-effective than traditional systems.
- Compared to traditional systems initial construction costs are significantly less, installed and commissioned much faster than traditional systems.
- Non-communal systems can be easily phased to handle small developments and expanded by adding more modules to the system as more development proceed

For additional benefits of Communal Water and Wastewater systems, please see enclosed letter prepared by Valdor Engineering, dated May 13, 2026. It should be highlighted that since the non-communal systems can be phased it is important that the regulations not include any upset limits to the number of homes and businesses it can support.

We appreciate your consideration and we are available to provide any additional information or respond to any questions at your convenience.

Sincerely,



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Elsa Fancello  
Cortel Group



## VALDOR ENGINEERING INC.

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13 May 2026  
File: **24103**

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**Re: ERO No. 026-0302: Communal drinking water and wastewater system municipal consent requirements**

On behalf of our client Cortel Group, we are writing to address ERO Submission 026-0302. Specifically, we want to provide some insight based on our experience and what we've learned previously regarding the use of Decentralized Wastewater Treatment Systems which makes them ideal for any kind of development taking place in any community where there is demand for growth and a shortage for the provision of sufficient wastewater treatment capacity.

Communal Water and Wastewater systems have been used quite extensively throughout the Province of Ontario. There are over 50 Decentralized Communal Systems installations in Ontario with both private and municipal ownership.

Many of the benefits are summarized as follows:

### **Capital Costs**

Capital costs for Communal Treatment Systems are a fraction of the cost of traditional treatment plants. The systems are primarily factory built and shipped to the site saving millions of dollars in installation costs.

### **Land Area**

The treatment units are more compact than traditional wastewater treatment systems by requiring anywhere from 50-70% less land in most situations. This saves a lot of development land which can be used for more residential units, commercial uses or parkland.

### **Best Available Technology**

Advanced treatment process such as the Member Bioreactor Technology (MBR) which draws water through a series of filtration membranes breaking down bacteria and contaminants for outgoing clean water for discharge or reuse.



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## Phased Community Growth

Non-communal systems can be easily phased to service small developments and expanded by adding more modules to the system as development grows. There is no development limit to these systems. They are capable of servicing 50 lot communities and much larger communities with thousands of units by just adding more modules to the system. Operational expenditures align directly with phased growth ensuring responsible growth, sustainability and providing efficient use of resources. Adding additional treatment modules also speeds up the availability of treatment capacity without the need for higher capital costs, extensive design and Environmental Assessments as is the case with traditional treatment systems which can significantly slow down the availability of treatment capacity and significantly delay the development expansion process.

## Sustainable Reuse Options

Clean effluent water from such systems do not necessarily require a large water body for final discharge. Reuse options of sediments and biosolids include agricultural fertilizer and composting options to satisfy local sustainability initiatives.

Effluent water can be provided for non-potable uses such as irrigation for parks, green spaces and golf courses which puts water back into the ground and can assist with maintaining water balance and groundwater recharge in developed areas. Industrial reuse for cooling towers or process water.

## Annual Maintenance Cost

Annual maintenance of decentralized treatment systems often matches the efficiency of centralized systems. Routine inspections are required, biological monitoring and occasional equipment servicing.

## Advantages to Municipalities

The following are advantages that Municipalities would experience with decentralized treatment systems:

- Accelerated Development Timelines which allows immediate housing development without the need to wait for lengthy studies and infrastructure upgrades.
- Lower Municipal Investment in which capital costs are borne by the developer reducing municipal financial strain and debt.
- Environmental Benefits such as the MBR technology by New Terra achieves significantly higher water quality providing increased protection to local water bodies from nutrient loading and pollution.
- Flexible and Scalable Infrastructure with the phased approach ensures a proper alignment with growth and avoids costly, oversized upfront costs.
- Asset Creation in which the Municipality gains valuable infrastructure assets with very minimal initial costs compared to the traditional systems.
- Improved Density Management since compact decentralized systems allow for much less land use and maximizes tax revenue from additional residential development.

In addition to the above Ontario's Provincial Planning Statement (2024) explicitly identifies decentralized communal wastewater systems as the preferred servicing method in areas without planned municipal infrastructure.

In conclusion Communal Wastewater Treatment Systems are highly cost effective, can service large communities, allow for development to proceed in a phased manner providing increased capacity availability when required in comparison to traditional systems in which expansion capacity is costly and takes significantly longer to achieve. The MBR process provides significantly higher treated water quality and is more diverse for sustainable reuse options.

We trust that this is sufficient for your use. Should you have any questions please do not hesitate to contact us.

Yours truly,

**VALDOR ENGINEERING INC.**



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