



May 8, 2026

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

Re: Conservation Ontario's comments on "Proposed amendments to the Water and Wastewater Public Corporations Act, 2025 and consequential amendment to the Safe Drinking Water Act, 2002" (ERO#026-0301)

Conservation Ontario (CO) represents Ontario's 36 Conservation Authorities (CAs), whose mandatory programs and services include drinking water source protection. CAs operate as Source Protection Authorities (SPAs) under the *Clean Water Act*, 2006. These comments are not intended to limit comments submitted individually by CAs on this proposal.

The Ministry of Municipal Affairs and Housing (MMAH) is seeking feedback on proposed amendments to ensure continued public sector ownership, enable the uninterrupted transfer of contracts and employees to a water and wastewater public corporation, prohibit the transfer of long-term municipal debt to the corporation, and make consequential amendments to the *Safe Drinking Water Act, 2002*.

Conservation Ontario supports MMAH's proposal to amend the *Water and Wastewater Public Corporations Act, 2025* to explicitly prohibit private equity ownership in municipal service corporations delivering water and wastewater services. Conservation Ontario understands that maintaining municipal ownership and ensuring these services remain subject to the *Clean Water Act* helps safeguard Ontario's municipal drinking water sources.

In addition, Conservation Ontario supports the proposed amendment to the *Safe Drinking Water Act* (SDWA) to clarify that drinking water systems owned by Water and Wastewater Public Corporations are deemed municipal drinking water systems and therefore subject to the SDWA's requirements as such. These safeguards are understood to ensure that water corporations are subject to the same public health and safety requirements that apply to all municipal drinking water systems, including source water protection.

With respect to the proposed amendments, Conservation Ontario seeks clarification on whether Consolidated Linear Infrastructure (CLI) Environmental Compliance Approvals (ECAs) would continue to apply as a regulatory tool for public corporations, and whether existing CLI ECAs for previously approved systems could be transferred under the proposed new framework. Clarification on this matter, either within the amended *Water and Wastewater Public Corporations Act, 2025* or through consequential amendments to the *Safe Drinking Water Act, 2002*, would assist in providing regulatory certainty.

Thank you for the opportunity to provide comments on “Proposed amendments to the Water and Wastewater Public Corporations Act, 2025 and consequential amendment to the Safe Drinking Water Act, 2002” (ERO #026-0301). We would be pleased to discuss these comments at your convenience.

Conservation Ontario

c.c: Conservation Authority CAOs/GMs