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Via ERO: 026-0302

Township of Puslinch
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May 11, 2026

RE: ERO 026-0302 – Communal Drinking Water and Wastewater System Municipal Consent Requirements

The Council of the Township of Puslinch appreciates the opportunity to comment on ERO 026-0302 regarding proposed amendments to support non-municipal communal drinking water and wastewater systems.

The Township is a rural municipality with no municipal water or wastewater servicing infrastructure. As such, alternative servicing approaches may provide important opportunities to facilitate appropriate residential development, diversify housing options, and support modest growth in rural communities where full municipal systems are not available.

Accordingly, the Township is supportive in principle of the Province's efforts to create a clearer and more predictable framework for communal systems, particularly where it may help address housing supply challenges in un-serviced municipalities.

However, given the unique circumstances of rural municipalities, the Township respectfully requests that any future regulations include strong safeguards to ensure municipalities are not exposed to undue risk or future liabilities. In particular, the Township recommends that the Province require:

- 1) Full lifecycle financial assurance, including reserve funds sufficient for maintenance, replacement, emergencies, and decommissioning;



- 2) Clear long-term ownership and operational accountability by qualified system operators;
- 3) No mandatory municipal assumption of failed private communal systems without municipal consent;
- 4) Strong environmental and public health oversight to protect groundwater and surrounding rural lands;
- 5) Recovery of municipal administrative, legal, and peer review costs associated with applications and oversight; and
- 6) Flexibility for municipalities to impose site-specific conditions where necessary to address local circumstances.

For rural municipalities such as Puslinch, communal systems may be a useful tool when appropriately regulated, but they must not create future financial burdens for local taxpayers or transfer private infrastructure risks onto municipalities.

Thank you for the opportunity to provide comments.

Sincerely,

Justine Brotherston
Municipal Clerk