



November 22, 2025

Via email: permissions.modernization@ontario.ca
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Re: Conservation Ontario's comments on the "Proposal to amend the Ontario Water Resources Act to enable the regulation of additional sewage systems under the Building Code to support construction of on-farm worker housing"(ERO# 025-0900); "Policy proposal to regulate additional sewage systems under the Building Code to support construction of on-farm worker housing" (ERO# 025-0899); and "Streamlining environmental permissions for sewage works servicing on-farm worker housing" (ERO# 025-0872)

Conservation Ontario is the voice of Ontario's 36 Conservation Authorities (CAs). We offer the following comments further to CA mandatory programs and services, including natural hazard management, drinking water source protection and prescribed Acts (*Building Code Act*), as well as other programs and services enabled under the *Conservation Authorities Act*.

Conservation Ontario supports the province's agricultural sector and food supply chain and the provincial commitment to safeguarding human health and maintaining environmental protections.

- Conservation Ontario is committed to supporting a strong, competitive and secure provincial economy. Necessary components include providing safe housing and critical infrastructure development, and safeguarding sources of municipal drinking water.
- Conservation Authorities integrate their expertise in natural hazard management, drinking water source protection and septic approvals into Ontario's broader land use planning framework, helping to protect long-term investments in the province.

- Conservation Authorities employ and engage technical experts to bring the best available science and innovation to development proposals, including expertise in septic design, engineering, hydrogeology, and more.

The Ministry of the Environment, Conservation and Parks (MECP) and the Ministry of Municipal Affairs and Housing (MMAH) are proposing amendments to the regulatory frameworks for septic systems servicing on-farm housing. The **first proposal** includes transferring the regulation and enforcement of multiple septic systems on a single property (up to a cumulative limit of 50 000 L/day) from the *Ontario Water Resources Act* to the Ontario Building Code. There is no minimum lot size specified for either proposal.

- Conservation Ontario recommends that those responsible for issuing permissions continue to work closely with the local Conservation Authority to ensure that the septic system(s) are located outside of areas prone to natural hazards (flooding, erosion, etc) or susceptible to (ground)water contamination. This work is necessary to protect both municipal sources of drinking water and private wells and intakes.
- Conservation Ontario requests that this proposal be limited to housing, rather than including wastewater from on-farm processing operations.
- Conservation Ontario recommends that this proposal be scoped solely to on-farm worker housing and exclude other development activities that take place on agricultural lands (e.g. trailer parks).
- In areas where these activities could pose a significant drinking water threat, Conservation Ontario recommends that mandatory re-inspections of these systems take place.

The **second proposal** is to allow proponents with systems that range from 10 000 L -25 000 L/day to self-register on the Environmental Activity and Sector Registry (EASR) rather than seeking an Environmental Compliance Approval (ECA). The cumulative design capacity for systems on an agricultural property would be restricted to 50 000 L/day. Subsequent amendments to Ontario Regulation 287/07 (General) under the *Clean Water Act* are proposed to restrict the use of policies that regulate drinking water threats and enable amendments to be made to source protection plans to reflect these changes.

- Conservation Ontario recommends that the Province does not move forward with this proposal, due to its potential risks to sources of drinking water. It is noted that there is no minimum lot size specified for this proposal. Therefore,

there is a potential for many of these systems to be located in close proximity to each other, increasing the risk of significant cumulative effects.

- A multi-barrier approach is necessary to safeguard our sources of drinking water, which includes source water protection. The application of policies that regulate drinking water threats is necessary when increasing the potential number of those threats on the landscape.

Thank you for the opportunity to review and provide comments on the “Proposal to amend the Ontario Water Resources Act to enable the regulation of additional sewage systems under the Building Code to support construction of on-farm worker housing” (ERO# 025-0900); “Policy proposal to regulate additional sewage systems under the Building Code to support construction of on-farm worker housing” (ERO# 025-0899); and “Streamlining environmental permissions for sewage works servicing on-farm worker housing” (ERO# 025-0872). We would be pleased to discuss these comments at your convenience.

Sincerely,

Leslie Rich

Leslie Rich
Source Water Protection Manager

c.c. All Conservation Authority CAOs/GMs