



April 12, 2024

**The Honourable Andrea Khanjin, Minister of the Environment, Conservation and Parks**  
**The Honourable Sylvia Jones, Minister of Health**

Via email: [minister.mecp@ontario.ca](mailto:minister.mecp@ontario.ca)  
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**RE: Recommended Phase Out of Free Well Water Testing**

Dear Ministers,

The 2023 Auditor General's audit of Public Health Ontario (PHO) recommends that PHO, in conjunction with the Ministry of Health, update and implement a plan to streamline public health laboratory operations. In response, the Halton Hamilton Source Protection Committee passed the following resolution at their meeting on March 19, 2024:

***THAT** the Halton-Hamilton Source Protection Committee direct staff to write a letter to the Minister of the Environment, Conservation, and Parks, the Minister of Health, area municipalities, other Source Protection Committees and local health units requesting that the province does not proceed with the recommended phase out of free private well water testing in Ontario.*

The Halton Hamilton Source Protection Committee is concerned about the proposed phase-out of free water testing for private drinking water. Approximately 50,000 residents in the Halton Hamilton Source Protection Region rely on non-municipal water sources, like private wells, which lack legislative protection. Free testing reduces financial and logistical barriers for residents, enabling regular testing that helps ensure safe drinking water sources. The committee urges the province to not proceed with the phase-out, as outlined in the attached March 19, 2024 committee report.

Yours truly,

Robert Edmondson  
Chair, Halton-Hamilton Source Protection Committee

Cc. Source Protection Committee Chairs and Program Managers  
City of Hamilton Public Health  
Halton Region Public Health



Halton-Hamilton  
Source Protection Region

City of Hamilton, Town of Grimsby, Niagara Region, Township of Puslinch, County of Wellington, Halton Region, City of Burlington, Town of Halton Hills, Town of Milton, Town of Oakville, Peel Region, City of Mississauga

**Report To:** Halton-Hamilton Source Protection Committee  
**Report No.:** SPC-24-03-09  
**From:** Martin Keller, Senior Manager, Watershed Planning and Source Protection  
**Date:** March 19, 2024  
**Subject:** **2023 Auditor General Report – Proposed Phase Out of Free Well Water Testing**

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### **Recommendation**

**THAT** the Halton-Hamilton Source Protection Committee receives for information the staff report SPC-24-03-09 2023 Auditor General Report – Proposed Phase Out of Free Well Water Testing;

**AND THAT** the Halton-Hamilton Source Protection Committee direct staff to write a letter to the Minister of the Environment, Conservation, and Parks and the Minister of Health requesting that the province does not proceed with the recommended phase out of free private well water testing in Ontario.

### **Executive Summary**

The 2023 Auditor General’s Value-for-Money audit of Public Health Ontario (PHO) recommended that PHO, in conjunction with the Ministry of Health, update and implement a plan to streamline public health laboratory operations. The plan included gradually discontinuing free private drinking water testing. The proposed phase out of free water testing for private drinking water is of concern. Private systems are not protected through legislated requirement under the *Safe Drinking Water Act, 2002*, and *Clean Water Act, 2006*, but are more likely to contribute to cases of gastrointestinal illness than municipal systems. In the Halton Hamilton Source Protection Region, about 50,000 resident do not receive water from municipal systems, with many relying on private drinking water system, including wells. Currently, both the City of Hamilton and Halton Region offer free well water testing. In 2012, a quarter of all samples from private residential wells and cisterns in Hamilton had unsafe levels of bacteria. Free private well water testing reduces barriers for residents to regularly test their wells. If implemented, the proposal to privatize well water testing will increase the risk for residents on private systems becoming ill.

### **Report**

In December 2023 the Auditor General released its [Value-for-Money Audit of Public Health Ontario \(PHO\)](#). The audit, among other items, found that PHO’s laboratory sites were not operating efficiently. In 2017, PHO developed a plan collaboratively with the Ministry of Health to modernize its laboratory operations by consolidating resources into

fewer laboratory sites and discontinuing or restricting eligibility for certain tests. This plan has not been approved and implemented. According to the audit, implementation of this plan was put on hold due to the construction of the new London public health laboratory, as well as increased capacity required from all PHO laboratory sites for COVID-19. Audit recommendation #5 states that PHO, in conjunction with the Ministry of Health, should update and implement a plan within 12 months to streamline public health laboratory operations.

The 2017 plan proposed to gradually close six of the 11 public health laboratory sites (Hamilton, Kingston, Orillia, Peterborough, Sault Ste. Marie and Timmins) and changing the types of test offered at the PHO laboratory sites, including gradually discontinuing free private drinking water testing. Mitigating rising costs of maintaining facilities and establishing a more efficient operating model that reduces the rerouting of samples to other PHO laboratory sites are stated as the main reasons for the plan.

The proposed phasing out of free private drinking water well testing is of concern. Private drinking water systems do not have the legislated safeguards that are required for municipal, communal, and public systems under the *Safe Drinking Water Act, 2002*. Neither are the water sources of private drinking water systems protected through the source protection program under the *Clean Water Act, 2006*. Under the *Clean Water Act, 2006*, only municipal drinking water systems are mandated to be included in the source protection program. According to Health Canada's guidance on waterborne pathogens, private and small community water systems are vulnerable and recognized as being more likely to contribute to cases of human gastrointestinal illness than municipal systems.

In the Halton Hamilton Source Protection Region, 95% of the population receive their drinking water from municipal systems. The remaining 5%, or about 50,000 residents, receive their drinking water from non-municipal systems, many of them private drinking water wells. Testing of private well water is one of the only avenues for residents on private systems to ensure their drinking water is safe. Well water testing of private wells is the responsibility of each well owner. Currently, both the City of Hamilton Public Health Services and Halton Region Public Health offer free private drinking water testing through the PHO Hamilton laboratory site. The City of Hamilton Public Health Services recommends testing at least three times a year for bacteria. In 2012, about a quarter of all water samples from private residential wells and cisterns in Hamilton had unsafe levels of bacteria.

Free private well water testing is important to reduce barriers for residents to test their wells on a regular basis. Without free water testing, well owners would need to use commercial labs for a fee, which disincentivizes testing. Without regular testing, water quality is unknown, and residents are at increased risk of falling ill.

In the Walkerton Inquiry Report Part 2, Justice Dennis O'Connor concluded the privatization of laboratory testing of drinking water samples contributed directly to the E. coli O157:H7 outbreak in Walkerton, Ontario in May 2000. Twenty-four years later, there is a proposal to privatize water testing once again.

Signed & respectfully submitted:



Martin Keller  
Senior Manager, Watershed Planning and Source Protection



Mardi Bergen  
Source Water Information Coordinator, Watershed Planning and Source Protection