



April 10, 2024

Hon. Sylvia Jones, Ontario Minister of Health

Hon. Andrea Khanjin, Ontario Minister of the Environment, Conservation and Parks

Hon. Lisa M. Thompson, Ontario Minister of Agriculture, Food and Rural Affairs

Via email: Sylvia.Jones@pc.ola.org
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RE: 2023 Auditor General Report on Public Health Ontario Recommending Gradual Discontinuation of Free Private Drinking Water Testing

Dear Ministers,

At the most recent Niagara Peninsula Source Protection Committee (SPC) meeting held on March 26, 2024, The Source Protection Committee (SPC) discussed the Ontario Auditor General's Value-for-Money Audit of Public Health Ontario released in December 2023. Recommendation 5 within the report states that Public Health Ontario (PHO), in conjunction with the Ministry of Health, update and implement a plan within 12 months to streamline public health laboratory operations:

https://www.auditor.on.ca/en/content/annualreports/arreports/en23/AR_publichealth_en23.pdf

As part of the recommendation, there is the suggestion in the report that the free private drinking water testing program that is provided by PHO be gradually discontinued. The discontinuation of this free program is of concern to the Niagara Peninsula SPC because it removes a free service available to those that don't benefit from legislated drinking water protections. The program provides valuable drinking water quality data to both researchers and the public. Discontinuation of the program would further disincentivize the testing of private drinking water systems, resulting in increased barriers to gathering valuable water quality data.

The SPC passed the following motions at the meeting held on March 26, 2024:

That the Source Protection Committee (SPC) DIRECT staff to draft correspondence requesting the Province not to proceed with the recommended phase out of the free drinking water testing program in Ontario;

And that the SPC circulate a copy of the correspondence to the Ontario Minister of Health, the Ontario Minister of the Environment, Conservation and Parks, the Ontario Minister of Agriculture, Food and Rural Affairs, and forward the letter to Niagara Region and all twelve of Niagara's lower-tier municipalities, the City of Hamilton, and Haldimand County.

The mandate of the SPC is to act as an independent multi-stakeholder committee with the goal of protecting our existing and future sources of drinking water. Despite private drinking water systems not being a part of that mandate, the SPC acts as stakeholders and professionals with a vested interest in the overall protection of all our drinking water sources. The PHO free private drinking water testing program has been a valuable resource to those that do not benefit from the protections and safeguards offered by the *Clean Water Act, 2006* and the *Safe Drinking Water Act, 2002*, in particular those in rural Ontario. The Province of Ontario, local municipalities and industry professionals have always recommended that that owners of private drinking water systems utilize the free drinking water testing program as a starting point.

Further to the obvious benefit the program provides, the data collected from the program has been valuable to researchers as well. Researchers have identified multiple areas across Southern Ontario that have statistically significant instances of bacterial contamination in private drinking water samples, including the Niagara Peninsula. While there are likely several factors contributing to Niagara's high instances of bacterial contamination in private drinking water samples including, improperly constructed/spaced private water supply wells, and improperly designed and/or compromised septic systems to name a few, this revelation was only made available using the data collected from the free drinking water testing program offered by PHO.

Lastly, the removal of the free testing program will further disincentivize the testing of private drinking water and introduce barriers to those that rely on the program to determine the quality of their water supply. The Province of Ontario recommends testing private drinking water systems frequently to ensure the water is suitable for potable use and points to the free testing program provided by PHO. While private drinking water wells typically dominate the discussion when it comes to private drinking water quality,

cistern users also utilized the PHO free testing program. By discontinuing the program, private drinking water users would have to pay for private drinking water testing services to obtain any information about their water quality. This unfortunately disincentivizes testing as well as introduces financial barriers to those struggling with the increasing costs of living. If users begin to test their drinking water infrequently or not at all, this will likely result in increased incidents of water-borne illnesses.

In summary, the Niagara Peninsula SPC is concerned that the discontinuation of the free drinking water testing program provided by PHO will ultimately have a negative impact on the residents that rely on it in Ontario. While efficiency may be gained by reducing the number of laboratories, another method of submitting private drinking water samples to remaining laboratories should be considered. For example, facilities that already send samples to provincial laboratories (hospitals, public health units) could be considered as drop-off points for private water samples thus making use of centrally coordinated courier services. The Niagara Peninsula SPC, through this letter, would respectfully request that those responsible for making these decisions reconsider the discontinuation of the very important private drinking water testing program provided by Public Health Ontario.

Thank you for your time and consideration of this request.

Sincerely,



Bill Hodgson
Chair
Niagara Peninsula Source Protection Committee

CC: Niagara Region
City of Hamilton
Haldimand County
Municipalities of Grimsby, Lincoln, St. Catharines, Niagara-on-the-Lake, West
Lincoln, Pelham, Thorold, Welland, Niagara Falls, Wainfleet, Port Colborne and
Fort Erie