

Thursday, May 14, 2026

Minister Rob Flack
Ministry of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, ON M7A 2J3

Dear Minister Flack,

Re: OPPI Feedback on ERO 026-0302: Communal drinking water and wastewater system municipal consent requirements.

On behalf of the Ontario Professional Planners Institute (OPPI), we are pleased to provide input on this ERO. OPPI supports integrated water and wastewater planning approaches that proactively protect existing and future drinking water sources while supporting the Province's broader objective of facilitating housing and infrastructure delivery. As the Province considers frameworks intended to streamline approvals for communal drinking water and wastewater systems, it will be important to ensure that efficiency measures do not compromise long-term drinking water protection, public safety, or the overall integrity of the planning system. Maintaining strong and consistent protections across all systems is essential to ensuring public confidence and sustainable long-term outcomes.

In this regard, we encourage the Province to embed strong and explicit integration of source water protection planning as a foundational component of any regulatory framework enabling communal drinking water systems. *The Clean Water Act, 2006* provides an important framework for protecting municipal drinking water sources and ensuring that land use planning decisions appropriately consider risks to water quality and quantity. Incorporating requirements under the Act, including provisions such as section 34, into approval conditions and evaluation criteria for communal systems would help ensure that drinking water protection remains fully integrated into planning and infrastructure decision-making.

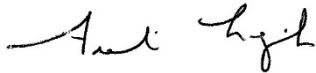
We also recommend that early engagement with Source Protection Authorities form part of the approvals process for communal systems. Early coordination can help identify potential issues sooner, support more efficient approvals, and assist municipalities and applicants in ensuring that drinking water protection requirements are appropriately addressed from the outset.

At the same time, consideration should be given to the potential long-term implications for municipalities. We do not support obligating municipalities to provide consent to communal water and wastewater utilities, particularly where significant public investment has already been made in municipal infrastructure systems. There are also important considerations under the *Safe Drinking Water Act, 2002*, where municipalities may ultimately be required to assume responsibility for non-municipal systems that fail to meet provincial standards. In such cases, municipalities may also inherit associated operational, financial, and source protection planning responsibilities.

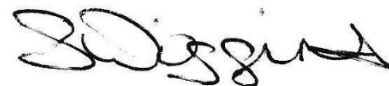
We encourage the Province to continue working collaboratively with municipalities, planners, Source Protection Authorities, and infrastructure providers to ensure that any expedited approvals framework continues to uphold strong drinking water protections while supporting efficient and coordinated infrastructure planning across Ontario.

Thank you for the opportunity to provide feedback on 026-0302. We would be pleased to meet with you to discuss our recommendations and how they align with the overall goal to protect drinking water sources while supporting the facilitation of housing and infrastructure delivery. If you have any questions or would like to schedule a meeting, please do not hesitate to contact us at (647) 326-2328 or by email at s.wiggins@ontarioplanners.ca.

Sincerely,



Andria Leigh, MCIP, RPP, Dipl.M.M.
Chair, OPPI



Susan Wiggins, CAE, Hon. IDC
Executive Director, OPPI