

Watershed-based Source Protection Planning

A CFFO Response to the White Paper of February 2004

Introduction

CFFO discussions on the White Paper on Watershed-based Source Protection Planning, February 2004, happened under a cloud of frustration – irritation that a second major pollution prevention initiative is being undertaken while the pollution prevention details of the Nutrient Management Act are far from settled. Farmers own the majority of the lands that will be impacted by the regulations under both of these acts. Another regulatory burden requiring time and paperwork is unwelcome.

CFFO is a strong supporter of stewardship initiatives that enhance our environment and the countryside. But we are skeptical that our time, resources and money will be well spent by a regulatory approach. We are confident that stewardship and pollution prevention will blossom only when a system of environmental payments have been developed – payments that reward farmers and landowners for the environmental services that their lands provide for the benefit of all.

(Note: The bolded statements ask for changes to what is proposed in the white paper. The regular type supports the white paper.)

Source Protection

1. That CFFO endorse the making of locally developed source water protection planning mandatory in watersheds across Ontario.
2. That the boundaries of watershed authorities be the boundaries of existing conservation authorities and **if any boundaries are different, the boundary of the conservation authority should be modified as well.**
3. **That the creation of watershed regions is an additional layer of complexity in the structure that needs to be reconsidered.**
4. That we support the board of directors of the local conservation authority being assigned the responsibilities of the source protection planning board (SPPB).
5. That we support the creation of a multi-stakeholder source protection planning committee (SPPC) to coordinate and develop the source water protection plan.

6. That we support the designation of water resources into four clearly identified categories:
 - Drinking water resources under significant and direct threat for immediate action;
 - Drinking water resources where risk reduction practices must be maintained;
 - Future drinking water resources for which action is required; and
 - **Surface water resources and other water resources that are not drinking water resources (e.g., wetlands, springs, heritage waters) that require remediation or protection.**
7. That we endorse the development of a risk assessment and management protocol that includes data quality and default values that would invoke the precautionary principle. (semi-quantitative risk assessment methodology)
8. That we endorse the process of requesting municipal resolutions in support of a draft watershed-based source water protection plan. **In the case of large watersheds it may be enough to seek endorsements for sub-watershed plans from each municipality involved in the sub-plan.**
9. **That the planning process for a source water protection plan include a requirement that the SPPB hold formal public hearings on the draft plan submitted by the SPPC before sending it to municipalities to seek their endorsement.** (Similar to public hearings on Official Plans under the Planning Act.)
10. **That one of the legislated components of all Watershed-based Source Water Protection Plans (SPP) be the full details of the cost of implementing the plan. Further, that the legislation prohibit the Ministry of Environment from approving the plan without the commitment of provincial funds for an appropriate level of cost-sharing (90%) for plan preparation and implementation by conservation authorities, municipalities and landowners.**
11. **That the legislation provides clear assurances that municipalities and conservation authorities will be bound by an approved source water protection plan.**

Water Taking

12. That we endorse the need to consider instream flow in all permits to take water (PTTW).
13. That we endorse a requirement to monitor and report the amount of water taking for any takings **over 100,000 litres per day.**

14. That we endorse the establishment of charges for water takings. That the charges **be scaled so that very large users pay a higher rate.** Those that remove water from a watershed for commercial purposes should also pay a **higher** rate.
15. That the **water taking charge be high enough to encourage conservation** and be related to the demand for water in a watershed (sub-watershed).
16. That we endorse the following being exempt from water taking charges: drinking water, fire protection, **agriculture up to 100,000 litres per day,** and conservation.

Threat Assessment

17. That we endorse the use of the precautionary principle in ranking threats from high to low.
18. That threats analysis, water resource sensitivity analysis, water resource vulnerability analysis and risk analysis compilation **be described in plain English so that property owners who will receive a semi-quantitative risk assessment for the water resources that they manage as a result of this process will be able to understand the information.**
19. That the Technical Expert Committee that develops the threat assessment **be an advisory committee to the multi-stakeholder SPPC.**
20. That each SPP recognize that there will be two kinds of significant costs for technical expertise: a) for the Technical Expert Committee and b) for extension to farmers and landowners as they participate in the development of the plan and do their own plans. Further, that each plan specify where the extension for landowners will be located and how the province will pay for this extension service.

*Amended by Provincial Council
Christian Farmers Federation of Ontario
January 31, 2007*