

## Request for Decision

### Source Water Protection - Implementation and Enforcement

Presented To: Finance and Administration Committee

Presented: Tuesday, Jul 10, 2012

Report Date Tuesday, Jul 03, 2012

Type: Managers' Reports

### Recommendation

Whereas Council has expressed the desire to protect municipal drinking water sources,

Whereas Council has expressed the desire for greater efficiencies in City operations,

Whereas the Province has delegated enforcement of Part IV of the Clean Water Act to municipalities,

BE IT RESOLVED THAT Council accept the report and recommendation that Enforcement of Part IV of the Clean Water Act be maintained by the City of Greater Sudbury as set out in the report from the General Manager of Infrastructure Services dated July 3, 2012;

#### Signed By

**Report Prepared By**

Nick Benkovich  
Director of Water/Wastewater Services  
*Digitally Signed Jul 3, 12*

**Recommended by the Department**

Greg Clausen, P.Eng.  
General Manager of Infrastructure Services  
*Digitally Signed Jul 3, 12*

**Recommended by the C.A.O.**

Doug Nadorozny  
Chief Administrative Officer  
*Digitally Signed Jul 3, 12*

### Finance Implications

Greater Sudbury Source Protection Authority (GSSPA) Responsibilities:

At this time, the GSSPA expects the Province to pay 100% for all mandatory implementation responsibilities outlined in the Clean Water Act. The GSSPA estimates at present that it could require up to an average of \$350,000 per year starting in fiscal year 2014.

Therefore, based on the current information from GSSPA, it is anticipated that the City will hopefully not have to provide any funding to the GSSPA for the implementation of the mandatory roles and responsibilities as identified in the Clean Water Act. However, the Province has not as yet indicated when it will make a final decision as to the amount of funding it will provide to implement mandatory tasks.

Implementing Part IV Policies:

Many of the policies in the Source Protection Plan identify the City as the implementation body. The costs associated with implementation of these policies will impact future operational and capital budgets beginning as soon as 2013. The extent of this impact is difficult to fully predict at this time as the report has not been finalized and costs will vary for operating Divisions of CGS according to the specific policies of the approved Plan.

The Risk Management Inspector position is a legislated requirement and will be incorporated in the 2013 Water and Waste Water operating budget.

## SOURCE WATER PROTECTION PLAN – IMPLEMENTATION AND ENFORCEMENT

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### **EXECUTIVE SUMMARY**

Ontario's Clean Water Act is a key cornerstone of the multi-barrier approach to protect drinking water from source to tap by stopping contaminants from entering sources of public drinking water systems such as lakes, rivers and aquifers.

The Greater Sudbury Source Protection Committee (GSSPC) has been charged with developing the local Drinking Water Source Protection Plan. The Plan which identifies threats to local municipal water supply sources and policies to mitigate those threats is nearing completion. The implementation phase of the Source Water Protection is scheduled to commence once the province approves the Plan which is expected as early as January 2013.

There are three (3) main areas of implementation responsibility. The GSSPA is mandated with maintaining, the Plan and associated data, updates, and annually reporting on progress. The CGS has been identified as an implementation body for 20 non-Part IV policies. Implementing these policies will require defining funding implications and allocating funds in the future operating and capital budget submissions from respective Divisions.

The Clean Water Act also defaults the implementation of Part IV Policies including enforcement to municipalities. As such, provisions of the Clean Water Act make municipalities responsible for enforcement of Part IV, including:

- Appointing a risk management official (RMO) and risk management inspectors (RMI's)
- Establishing rules or policies to administer Part IV, which may include fees, inspection programs, forms and applications.

CGS implementation of Part IV offers significant opportunities for synergies through the ability of several City Divisions to collaborate and integrate their work plans and operations as appropriate for the protection of municipal drinking water sources. For example, internal RMO and RMIs at the City would allow the requirements of the Source Protection Plan policies to be seamlessly integrated with City operations and processes such as development approvals and assist with Source Control enforcement as well.

The CGS staffing plan would include assigning RMO duties to an existing non-union position. Part of the RMO's key tasks will be to enter negotiations with the parties responsible for activities for which Risk Management Plans are required to ensure that these are prepared in a timely manner.

Estimated costs associated with meeting the requirement for Part IV Enforcement relates mainly with recruitment / staffing for one contract RMI position, training the RMO and the RMI(s), and ancillary costs. The annual expenses are expected to total approximately \$100, 000.

This report provides detailed information in support of the business case for retaining Part IV responsibilities by the municipality. It explains the advantages over the other alternative and seeks authorization to proceed accordingly with preparations as required to maintain full compliance with the requirements of the Clean Water Act.

## **BACKGROUND**

A public inquiry led by Chief Justice Dennis O'Connor was held following the Walkerton tragedy in 2000. In response to part of Chief Justice O'Connor's recommendations outlined in his 2002 report, The Strategy for Safe Drinking Water, the Province of Ontario drafted to include provisions to protect sources of public water supplies and enacted the Clean Water Act, 2006.

Ontario's Clean Water Act is a key cornerstone of the multi-barrier approach to protect drinking water from source to tap by stopping contaminants from entering sources of public drinking water systems such as lakes, rivers and aquifers.

Specifically, Ontario's Clean Water Act:

- Requires that local communities, through local Source Protection Committees, assess existing and potential threats to their water, and that they set out and implement the actions needed to reduce or eliminate these threats.
- Empowers communities to take action to prevent threats from becoming significant.
- Requires public participation on every local source protection plan.
- Requires that all plans and actions are based on sound science.

The Greater Sudbury Source Protection Committee (GSSPC) has been charged with developing the local Drinking Water Source Protection Plan and is comprised of three municipal representatives, three industrial and commercial business representatives, and three 'other' representatives from the environmental non-governmental sector and the public at large. Additionally, a number of non-voting liaisons sit at the committee representing stakeholders such as the Province of Ontario, Sudbury & District Health Unit, First Nations and the Greater Sudbury Source Protection Authority (GSSPA), which in our area is the Conservation Sudbury (Nickel District Conservation Authority).

The Greater Sudbury Source Protection Area Assessment Report, which was approved by the Minister of the Environment in 2011, identifies those activities that pose significant threats to local municipal drinking water sources. There are three categories of threats:

- Chemicals (solvents, fuels, fertilizers, pesticides);
- Pathogens (virus, bacteria or parasite that cause diseases); and,
- Water quantity threats that reduce the ability of water to 'recharge' or move from the surface to an aquifer, and contribute to the overuse of water in an area.

Of the 21 types of drinking water threats prescribed in Ontario Regulation 287/07, 18 are applicable to areas within the Greater Sudbury Source Protection Area with a total of 77 drinking water threats identified in the Greater Sudbury Source Protection Area. There are no identified water quantity threats in this area. Not all threats to municipal drinking water are equal; some carry greater risk to human health. A threat is determined to be significant if it meets the criteria listed by the Ministry of the Environment.

## **SOURCE PROTECTION PLAN POLICIES AND IMPLEMENTATION TOOLS**

The Greater Sudbury Source Protection Committee must develop policies to mitigate all existing and future significant threats to municipal drinking water sources within the Greater Sudbury Source Protection Area.

The Clean Water Act and Ontario Regulation 287/07 identify policy tools available to Source Protection Committees to address drinking water threats. There are several types of regulatory and non-regulatory policy approaches permitted. These are:

- Land Use Planning
- Prescribed Instruments (i.e., a permit or other legal document issued by the Province)
- Clean Water Act Part IV Tools:
  - Section 56 (Interim) Risk Management Plans
  - Section 57 Prohibition
  - Section 58 Risk Management Plans
  - Section 59 Restricted Land Uses
- Education and Outreach
- Stewardship and incentive programs
- Best management practices, pilot programs and research
- Other actions (e.g., specific municipal by-laws)

The Greater Sudbury Source Protection Plan (GSSPP) lists 45 policies designed to mitigate risks to local municipal drinking water sources, the majority of which apply to:

- Intake Protection Zone 1 of the municipal water intakes on the Vermilion River, the Wanapitei River, and Ramsey Lake;
- Well Head Protection Areas A and B of the municipal wells in Valley East; and,
- The Ramsey Lake Issue Contributing Area (i.e., most of the Ramsey Lake watershed).

## **IMPLEMENTING THE SOURCE PROTECTION PLAN**

Implementation responsibilities associated with the Greater Sudbury Source Protection Plan (GSSPP) are varied and can be divided into three main components as shown on Figure 1:

1. Mandated Responsibilities of the GSSPA after Plan Approval
2. Implementation of non-Part IV Policies
3. Implementation of Part IV Policies

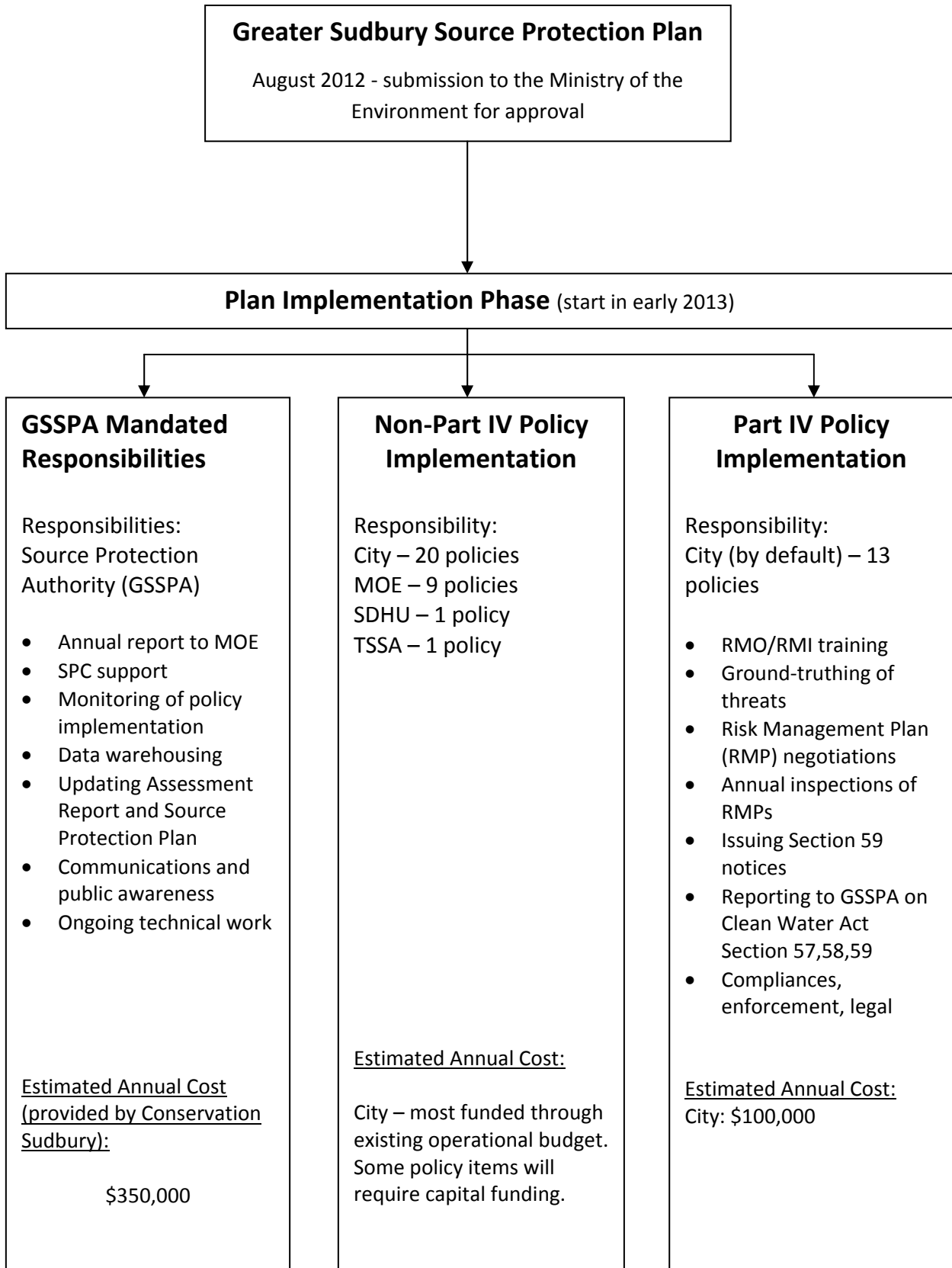


Figure 1 – Source Protection Implementation Responsibilities

## **Mandated Responsibilities of the GSSPA after Plan Approval**

The Clean Water Act (Section 46) mandates the Source Protection Authority to “*annually prepare and submit to the Director and the source protection committee in accordance with the regulations a report that,*

- (a) describes the measures that have been taken to implement the source protection plan, including measures taken to ensure that activities cease to be significant drinking water threats and measures taken to ensure that activities do not become significant drinking water threats;*
- (b) describes the results of any monitoring program conducted pursuant to section 45;*
- (c) describes the extent to which the objectives set out in the source protection plan are being achieved; and*
- (d) contains such other information as is prescribed by the regulations. 2006, c. 22, s.46 (1).”*

Given that the municipality will be implementing most of the policies (including monitoring) of the GSSPP, the GSSPA reporting obligations will be largely based on the municipality’s report to the GSSPA, which must be submitted annually by February 1<sup>st</sup>.

The GSSPA has given notice to the City that it will also be responsible for the following activities:

- Management of Greater Sudbury Source Protection Plan with adequate staff capacity.
- Support of Clean Water Act hearings and appeals related to Source Protection Plan policies.
- Data warehousing and information management (15 year minimum requirement).
- Ongoing support to all implementing bodies, which includes the City, as plan policies rollout and some of the uncertainties and unknowns have to be dealt with.
- Updates and revisions to the Terms of Reference, Assessment Report and Source Protection Plan as new issues arise and once the Province specifies the timeline for plan review updates, amendments and submission.
- Continuing support to the Greater Sudbury Source Protection Committee.
- Ongoing technical work to complete Tier 3 Water Budgets with policies that will have to be incorporated into the GSSPP.
- Other technical work in future planning cycles to update groundwater and surface water models, to address emerging issues such as the impacts of climate change, etc.

## **Implementation of non-Part IV Policies**

The City of Greater Sudbury is directly responsible for implementing most of the Source Protection Plan policies, including the Part IV policies. In fact, many of the policies point to or reinforce programs, initiatives and activities that the municipality has been undertaking for a number of years. The City needs to continue the many actions that it has been doing to protect municipal drinking water sources and its hundreds of lakes, including:

- Re-greening local watersheds since 1978, which contributes to healthy lakes, rivers and streams
- Lake Water Quality Program and Advisory Panel started in 2000 to help in the monitoring of local lakes and the support lakes stewardship groups.
- Spring phosphorus sampling on about 45 lakes.
- Education and outreach on lake stewardship issues, including use of de-ices, fertilizers, phosphorus-free home products, shoreline vegetation buffer strips, septic system maintenance, etc.
- Official Plan policies and Zoning By-law regulations – shoreline buffers, minimum lot size, watershed-based focus, wetland protection, and exclusion of incompatible land uses near municipal drinking water sources.
- Upgrading water and wastewater treatment plants.
- Sewer Use By-law to allow source control inspections.
- Detailed watershed mapping for some lakes.
- Shoreline Demonstration project at Science North.
- An annual Water Gathering for the community to help inform citizens on various water-related topics.
- Sediment control retrofits for existing situations.
- Storm water planning.
- Source Water Protection Planning.
- Monitoring of cyanobacteria and microcystin at municipal drinking water sources.
- Coherent water resonator – assessment for phosphorus control.
- Biological control of Eurasian water-milfoil.
- Salt Management Plan to help control the amount of road salt entering our lakes.

## **Part IV Enforcement**

Table 1 shows the number of non-Part IV and Part IV policies to be implemented from the Greater Sudbury Source Protection Plan along with the implementing bodies. As shown, the City is the implementing body for 65% of the non-Part IV policies. If Part IV policies are included, the City is the implementing body for 75% of all 44 policies in the GSSPP.

Table 1. Number of Greater Sudbury Source Protection Plan policies to be implemented.

	<b>Non-Part IV Policies</b>				<b>Part IV Policies</b>
<b>Implementing Body</b>	City	MOE	SDHU	TSSA	City (by default)
<b>Number of policies in Plan</b>	20	9	1	1	13



Most of the non-Part IV policies to be implemented by the City can be funded through existing operational funds. These include policies for education and outreach, water sampling for sodium and phosphorus, development of plans for management of pesticides on municipal properties, updating the City Salt Management Plan and Emergency Management Plan, continued implementation of the sewer use by-law, and several land use planning policies. As examples, two policies that may require additional funding allocations include development of a Stormwater Management Strategy for Ramsey Lake within five years, and the construction of a new road salt storage area at the Frobisher Depot. Funding for these two actions would need to be made through the capital envelopes of the responsible division.

### **Implementing and Enforcing Part IV Policies:**

In addition to the policies that serve to reinforce programs and actions that the City is already undertaking in protecting its municipal drinking water sources, the Source Protection Plan also contains Part IV policies. Part IV (Regulation of Drinking Water Threats) of the Clean Water Act provides municipalities with the authority to regulate activities that are significant drinking water threats on a site-specific basis, where such activities are located within intake protection zones or well-head protection areas.

The tools set out in Part IV of the act include:

- Section 56 (Interim) Risk Management Plans
- Section 57 Prohibition
- Section 58 Risk Management Plans
- Section 59 Restricted Land Uses

Under Part IV, any municipality that has the authority to pass by-laws under the Municipal Act for the production, treatment and storage of water is the enforcement authority (referred to as the “default municipality”). The City of Greater Sudbury (CGS) is the default municipality for the implementation of Part IV policies in the Greater Sudbury Source Protection Plan.

As such, provisions of the Clean Water Act make municipalities responsible for enforcement of Part IV, including:

- Appointing risk management officials and inspectors
- Making alternate arrangements (if desired) to delegate some or all of the Part IV enforcement authority by entering into an agreement with other public bodies
- Establishing rules or policies to administer Part IV, which may include fees, inspection programs, forms and applications.

In some areas of the province, source protection areas encompass many municipal jurisdictions and in such situations enforcement by a single municipality could be cumbersome without other enforcement options. Therefore, the Province has established in the legislation that municipalities are to have the primary responsibility of enforcing Part IV of the Act unless it chooses to delegate this responsibility to a board of health or a source protection authority (i.e., conservation authority).

The enforcement authority granted in Part IV can only be used to deal with situations involving where a local assessment report identifies significant drinking water threats. In Greater Sudbury, as in most other municipalities, this includes small areas directly around municipal wellheads and intakes that represent particularly vulnerable zones.

A default municipality is required to appoint a Risk Management Official (RMO) and Risk Management Inspector(s) (RMI), as necessary, to administer and enforce Part IV policies. These policies cannot be implemented until these appointments are made.

The role of the (RMO) includes:

- Negotiating or establishing risk management plans;
- Accepting risk assessments, and
- Issuing orders and notices.

The role of the (RMI) includes:

- Monitoring and ensuring compliance with risk management plans, and;
- Monitoring and ensuring compliance with prohibition policies.

Although the roles of the RMO and RMI differ, municipalities may elect to have one person fill both roles.

Appointments of the RMO and RMI must be done via certification by the municipality (similar to the certification process for building officials). To be appointed as an RMO or RMI, a person must have the qualifications prescribed by Ontario Regulation 287/07 (i.e., the completion of a course and exam which has been approved by the Ministry of the Environment).

Part IV implementation provisions are familiar to municipalities as these are based on the relevant Ontario Building Code Act provisions. The RMO and RMI will exercise their respective authorities under the act in a manner that is similar to the exercise of authority by Building Officials and Inspectors in Ontario.

Staffing decisions around municipal Part IV enforcement depends on many factors, including the number of significant threats that have been identified, the size/population of the municipality, available capacity and resources, and the extent of application of Part IV policies in the local source protection plan. For some municipalities, the RMO and RMI will be newly created positions, while for others these functions will be assigned to existing staff (e.g., sewer use by-law staff).

The act provides flexibility in determining Part IV enforcement arrangements. These enforcement arrangements must be documented between the default municipality and any other bodies involved. Alternative approaches to implementing Part IV policies include:

- Entering into an agreement to transfer enforcement to another body, for example a municipality, a source protection authority, or a board of health; and
- Two or more municipalities entering into an agreement to provide joint or shared enforcement and appointment of risk management officials and inspectors.

The only municipality concerned by almost all of the policies in the Greater Sudbury Source Protection Plan is the City of Greater Sudbury.

Transfer of authority may be a desirable option in jurisdictions where the source protection plan includes several municipalities, in municipalities where there are a small number of source drinking water threats, or in less populated or remote municipalities. None of these situations applies to Greater Sudbury.

The only other practical option to having the CGS implement Part IV policies is for CGS to transfer enforcement to the Greater Sudbury Source Protection Authority (i.e., Conservation Sudbury).

### **Clean Water Act Enforcement (Part IV)**

There are only two practical alternatives to the implementation of Part IV policies in the Greater Sudbury Source Protection Plan:

- CGS (Municipal) Enforcement
- Enforcement by the Greater Sudbury Source Protection Authority

### **Municipal Enforcement of Part IV of the Clean Water Act**

Given its long list of water protection accomplishments, its responsibility for implementing most of the Source Protection Plan policies, and the direction provided by provincial legislation, the City of Greater Sudbury has and should retain the responsibility of enforcing Part IV of the Clean Water Act. The specific business case in support of this alternative clearly demonstrates that this option represents a cost effective, sustainable, approach that integrates well with other CGS strategic initiatives.

### **Work Load & Enforcement Efficiencies**

The CGS staffing plan would include assigning the duties of RMO to an existing non-union position. Part of the RMO's key tasks will be to enter negotiations with the parties responsible for activities for which Risk Management Plans are required to ensure that these are prepared in a timely manner.

This staffing model envisions sharing the RMI functions over two positions that would reside in the Water/Wastewater Division: one new position and one existing source control inspector who would also be assigned duties of RMI. The RMIs are seen as field oriented staff responsible for inspecting activities associated with threats to municipal drinking water sources. Sharing the function over two staff positions would ensure seamless inspection / enforcement duties during periods of absence (i.e. for sickness, vacation, etc). Significant efficiencies could be generated from the integration of the Source Protection and Source Control roles into the City's Water/Wastewater Division Compliance Section where a full Quality Management System and other closely related functions currently exist to support the role.

The bulk of the work associated with the implementation of the Source Protection Plan will be done early (within about 12 to 24 months) after the approval of the Greater Sudbury Source Protection Plan. It is expected that the RMI work load will level out during the maintenance phase of the implementation requiring only routine inspections, review of monitoring data, related development approvals, and ongoing outreach programs.

Under this model, the ability to reassign duties to RMI staff in one Division offers improved flexibility to ensure that resources dedicated to the protection of municipal drinking water sources are most efficiently utilized. Also, the RMI's can perform multiple duties when in the field in a specific geographic area of the City (e.g., source control inspection and follow-up on risk management plan requirements). Importantly, all of the RMI's time will be dedicated to improving and protecting municipal drinking water sources, whether through enforcement or implementation of the Source Protection Plan.

## **Cross-divisional Collaboration**

CGS implementation offers the ability for many City divisions continue to collaborate and integrate their work plans and operations as appropriate for the protection of municipal drinking water sources. Internal RMO and RMIs at the City would allow the requirements of the Source Protection Plan policies to be seamlessly integrated with City operations and processes.

Another aspect of cross-divisional collaboration and process efficiency relates to development approvals. Certain development applications will require review by the RMO as part of the approval process. It has been the strategic goal of the CGS to achieve a streamlined development approvals process using a 'one window' approach. Development planners currently review applications for a variety of considerations when reviewing development applications. Efficiencies could result from adding source water protection considerations to their preliminary review criteria so that the RMO could focus only on those approvals that could have the potential of affecting municipal drinking water sources.

Maintaining the one-window approach would control the number of outside agencies reviewing applications and reduce the streamline the review time and associated fees to the applicant. From this perspective, having the RMO on City staff would represent a significant advantage to help meet this goal.

## **Enforcement of Part IV of the Clean Water Act by the Greater Sudbury Source Protection Authority**

The Clean Water Act permits municipalities to delegate the enforcement of Part IV to a board of health or a source protection authority (i.e., conservation authority). The Greater Sudbury Source Protection Authority/Conservation Sudbury (GSSPA/NDCA) Board has indicated that it would be prepared to assume this responsibility should the City chose to delegate it. The Greater Sudbury Source Protection Plan has been developed by staff housed at Conservation Sudbury and, as such, their staff has gained considerable knowledge on source protection planning by working closely with the Ministry of the Environment.

Knowledge for plan development is, however, different than for plan implementation. As such, provincial legislation around the implementation of the Plan policies and enforcement of Part IV has been assigned by default to municipalities. Therefore, it had been the original intention of the Province that the development of the Plan and its enforcement through Part IV be undertaken by different parties.

Under the Conservation Sudbury implementation proposal the opportunity for a flexible, efficient and integrated unit for municipal source water protection at the City would be lost. It would also be more costly overall since the levy to the Conservation Sudbury would need to be increased accordingly. The Province has not made any commitments regarding implementation funding for Source Water Protection.

After the Source Protection Plan is approved by the Province, and once the initial heavy implementation work load is completed the opportunity to deploy the RMO and RMI positions to other source water protection related functions would be lost.

## **Financial Implications of Implementation Areas**

### **a. GSSPA Responsibilities:**

At this time, the GSSPA expects the Province to pay 100% for all mandatory implementation responsibilities outlined in the Clean Water Act. The GSSPA estimates at present that it will require an average of \$350,000 per year starting in fiscal year 2014.

Therefore, based on the information from GSSPA, it is anticipated that the City will not have to provide any funding to the GSSPA for the implementation of the mandatory roles and responsibilities. However, the Province has not as yet indicated when it will make a final decision on this matter which could impact CGS costs.

### **b. Implementing Part IV Policies:**

Many of the policies in the Source Protection Plan identify the City as the implementation body. The costs associated with implementation of these policies will impact future operational and capital budgets. The extent of this impact is difficult to fully predict at this time.

### **c. Enforcing Part IV Policies:**

As mentioned previously, the Clean Water Act mandates the City of Greater Sudbury with the responsibility to implement Part IV policies. At this point without any provincial announcement around a funding formula, there remain a number of unknown costs however staff estimates costs associated with this alternative, are associated mainly with staffing for the functions of the RMO and the RMI.

Estimated costs associated with City implementation relate mainly with recruitment and staffing for one contract RMI position, training the RMO and the RMI(s), and ancillary costs. The 2013 expenses are expected to total \$96,000.

Part IV enforcement costs are similar whether the City or the GSSPA implement the Part IV policies of the Greater Sudbury Source Protection Plan as shown in Table 2.

**Table 2: Detailed Cost breakdown for City or GSSPA Implementation**

	2013	2014	2015	2016	2017
<b>Implementation of Part IV by municipality</b>					
<b>Salaries and benefits (1 contract RMI)<sup>1</sup></b>	\$92,000	\$94,000	\$96,000	\$98,000	\$100,000
<b>Training</b>	\$2,000	\$2,000	\$1,000	\$1,000	\$1,000
<b>Operating expenses</b>	\$2,000	\$2,000	\$2,000	\$2,000	\$2,000
<b>Vehicle<sup>2</sup></b>	\$0	\$0	\$0	\$0	\$0
<b>Total</b>	\$96,000	\$98,000	\$99,000	\$101,000	\$103,000
	2013	2014	2015	2016	2017
<b>Implementation of Part IV by GSSPA</b>					
<b>Salaries and benefits (1 contract FTE RMO/RMI)</b>	\$86,000	\$88,000	\$90,000	\$92,000	\$93,000
<b>Training</b>	\$2,000	\$2,000	\$1,000	\$1,000	\$1,000
<b>Operating expenses</b>	\$2,000	\$2,000	\$2,000	\$2,000	\$2,000
<b>Vehicle</b>	\$4,000	\$3,000	\$3,000	\$2,000	\$2,000
<b>Total</b>	\$94,000	\$95,000	\$96,000	\$97,000	\$98,000

*Dollar amounts have been rounded to the nearest thousand.*

<sup>1</sup> RMO duties to be assigned to existing staff and RMI function will require one contract position equivalent to a Source Control Officer. Salary has been inflated using core inflation target of 2%.

<sup>2</sup> No additional vehicle required as current fleet will be redeployed.

## Summary

CGS is responsible for implementing most of the policies in the Greater Sudbury Source Protection Plan. CGS is also the mandated default entity for implementing and enforcing the Part IV policies.

Citing similar advantages to those described above, most of the medium to large municipalities in Ontario have chosen to retain their Part IV enforcement authority. Municipal enforcement is associated with the potential for significant operational efficiencies and cross-divisional collaboration, and the consequent opportunities for better protecting municipal drinking water sources.

## **Recommendation**

Whereas Council has expressed the desire to protect municipal drinking water sources,

Whereas Council has expressed the desire for greater efficiencies in City operations,

Whereas the Province has delegated enforcement of Part IV of the Clean Water Act to municipalities,

BE IT RESOLVED THAT Council accept the report and recommendation that Enforcement of Part IV of the Clean Water Act be maintained by the City of Greater Sudbury as set out in the report from the General Manager of Infrastructure Services dated July 3, 2012;