

WATERSHED-BASED SOURCE PROTECTION PLANNING WHITE PAPER

A response from The Land Improvement Contractors of Ontario

The Land Improvement Contractors of Ontario believe that a sustainable supply of safe and clean drinking water is important and fundamental to the legacy we intend to leave for future generations.

The goal of the White Paper is consistent with LICO goals. However, the means for achieving those goals as outlined in the White Paper gives cause for some questions and observations.

- It is important that the regulation reflects and be consistent with the legislation.
- More bureaucracy and regulation will not ensure water safety. If one irresponsible person is in charge of any part of the process another Walkerton is inevitable. It was not a lack of regulation that caused this disaster – it was a lack of following existing regulation. Well known penalties are the only real deterrent to this problem.
- The white Paper suggests too much bureaucracy. This can be expensive, inefficient and increase risk.

To give cost efficiency, there should be only one SPPB. This should be at the provincial level and be associated with the Ontario Planning Act.

To insure accountability, the SPPC should consist of a minimum of 50% elected members. Appointees should be agreed on by a minimum of two-thirds of elected members.

The use of local boards and committees increases the risk that actions will be based on soft science and emotion.

- Benchmark scientific data must be available before any action is implemented:
 1. To establish and confirm aquifer characteristics.
 2. For the measure of progress toward attainable targets.
 3. To insure that practices implemented are appropriate.
- Where property owners are required to make land use changes there must be financial compensation. In some cases, land should be purchased for source water protection and held in some sort of trust. Where owners are required to change land management the requirement must have scientific basis and there must be compensation for capital cost and for reduced income for the landowner.

The compensation package must be in place before any action on source water protection begins. This would demonstrate evidence of PUBLIC COMMITMENT to the cause as outlined in the “White Paper”.

- Priorities for action need to be established.

1. Health must always be first.

Actions intended to protect health must have their basis in evidence-based science.

2. Efficient food land use allows the very existence of much of the remaining wetland and forest. Well-managed soil moisture and water contribute to that efficiency. Generally, this requires drainage, irrigation and the installation and application of soil conservation measures.

Decisions that impact on food land use must be based on sound evidence-based science.

Health and food are essential priorities. Now, we can consider others:

3. The ecological integrity of our surroundings. This is important, however, it may not be realistic to expect every creature to exist everywhere at the expense of human needs (survival?).
 4. Industrial use of water adds value to our economy and standard of living.
 5. Recreational use adds to quality of life.
 6. Commercial taking and sale of water adds little or nothing to health or any other aspect of life in Ontario.
- The universal water taking charge as proposed by MOE appears to be a tax to pay for source water protection. This will be a political “hot potato”. Do people who now pay a water levy realize that they in fact do not presently pay for water – just the treatment and delivery of it? People who provide their own water supply will be required to install metering equipment and report and pay for water. To be fair, everyone including those who currently pay a water levy would need to pay for all water used.

How does agriculture build an added water cost into the price of food?

What is our NAFTA commitment regarding attaching a value or price to water?

Has MOE considered its role as a water-vending corporation in light of the world experience? Generally, there is a strong often violent social backlash.

- The notion that access to clean healthy water is a “right” needs to be challenged. Rights must be earned through responsible actions. Social “responsibilities” need to be detailed in the Act. The public cannot afford and ultimately will not tolerate the level of government intervention that would be necessary to provide absolute protection of water quality and quantity. On the long run, it is most important that the public understand their responsibilities and the consequences of their actions.