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Number 11924 8771 RR0001

James Scott
Senior Policy Analyst
Ontario Ministry of the Environment
135 St. Clair Avenue West, 11th Floor
Toronto, ON M4V 1P5

January 26, 2007

Re: EBR Posting PA06E0013 - Discussion document for the development of a regulation on source protection committees made under the Clean Water Act, 2006

Dear Mr. Scott,

The Ontario Public Health Association (OPHA) has been a voice for public health in the province of Ontario since 1949. The OPHA is a voluntary, charitable, non-profit association consisting of individuals and ten constituent societies. Its mission is to provide leadership on issues affecting the public's health and to strengthen the impact of people who are active in public health and community health in Ontario. On behalf of the Environmental Health Workgroup of the OPHA, thank you for the opportunity to comment on the development of a regulation on source protection under the Clean Water Act.

The goal of the Clean Water Act is to protect existing and future sources of drinking water, as part of an overall commitment to human health and the environment. The source protection committees would be responsible for the production of locally developed, science-based assessment reports and source protection plans. OPHA is supportive of this goal and believes that public health has a role to play.

Participation on the part of Medical Officers of Health (MOHs) or a designated Public Health Inspector (PHI) is essential to the process of developing source protection plans. The MOHs or their designates will provide a public health perspective to the planning process and advice on imminent threats to drinking water specific to the locality. The challenge is that the source protection areas or regions do not correspond to health unit boundaries and there may be multiple health units involved in a source protection area. For example, the large source protection

area such as Credit Valley-Toronto and Region-CLOCA, covers the entire City of Toronto and the Region of Peel as well as portions of the Regions of Halton, York, and Durham and of the Counties of Wellington, Dufferin and Simcoe.

We concur with your proposal that the local MOHs be represented on the committee. To that end, we put forward that MOHs, or their designates, participate as ex-officio members of the committee. We understand that meetings have been planned with the Ministry of Health and Long-Term Care as well as with the Association of Local Public Health Agencies (ALPHA) to address these challenges.

Thank you for the opportunity to comment.

Yours sincerely,

Dr. Garry Aslanyan
President, OPHA

cc: Linda Stewart, Executive Director, Association of Local Public Health Agencies