

April 8, 2024

Honourable Andrea Khanjin, Ontario Minister of Environment, Conservation and Parks

Honourable Sylvia Jones, Ontario Minister of Health and Long-Term Care

Honourable Shelly Spence, Auditor General of Ontario

Via e-mail:

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comments@auditor.on.ca

Re: Recommended Phase Out of Free Well Water Testing in the 2023 Auditor General's Report

In the 2023 Auditor General's Value-for-Money Audit of Public Health Ontario (PHO) released in December 2023, recommendation number 5 states that PHO, in conjunction with the Ministry of Health (MOH), are to update and implement a laboratory modernization plan within 12 months to streamline the laboratory's operations.

https://www.auditor.on.ca/en/content/annualreports/arreports/en23/AR_publichealth_en23.pdf

This stemmed from a 2017 proposal by PHO, collaboratively with the MOH at the request of the Deputy Minister to close six of the 11 public health laboratory sites (Hamilton, Kingston, Orillia, Peterborough, Sault Ste. Marie and Timmins) and gradually discontinue private drinking water testing. The justification:

- Mitigating rising costs of maintaining facilities
- Establishing a more efficient operating model that reduces the rerouting of samples to other PHO laboratory sites

The proposed removal of PHO's free private drinking water testing is of concern to our Thames-Sydenham Source Protection Committee, particularly when Source Protection Regions have been directed by the Ministry of Environment, Conversation and Parks, Source Protection Branch, to deliver education and outreach to private well owners under the new Best Practices initiative.

In our region, we have been working with other Source Protection Authorities, service and community organizations such as the Lions, Optimists to co-host Best Practices 'Water Wise' events that encourage private well owners to sample their drinking water using the free microbial testing provided by the province. By distributing water sample bottles ahead of the event and delivering the samples to Huron Perth Public Health for lab analysis, most of the barriers to water sampling are removed. At these events 25% to 50% of a community's well water will be sampled in one day or night.

Well owners understand the importance of testing their well water; it is the inconvenience of doing so that is the barrier. One of the goals of the 'Water Wise' events is to encourage well owners to get in the habit of testing their water regularly as part of Best Practices for protecting their drinking water.

Private drinking water systems in Ontario do not have the legislated safeguards that are required for municipal/communal/public systems under the *Safe Drinking Water Act, 2002*. Only municipal water supply systems fall under the *Clean Water Act, 2006* and the Source Water Protection program. Health Canada's guidance on waterborne pathogens references three studies that determine that private systems are vulnerable and there is evidence that demonstrates they are more likely to contribute to gastrointestinal illness than public drinking water systems.

If the free water testing phase out recommendation is approved, well owners would have to use a commercial lab for a fee, which disincentivizes testing. When water is not monitored regularly, there is no way to know the true quality of the water, which puts people at increased risk of becoming ill. With private systems being stand-alone systems, any associated illnesses are isolated sporadic events and do not come to public attention like those seen during the Walkerton outbreak.

The private drinking water test data maintained by PHO has been used by researchers to publish evidence that helps support public health policy. Source Protection Committees can access data associated with their area, as was presented at our March 2023 meeting. The data can be used to inform well owners of regional water quality concerns and associated health risks. If PHO stops testing, this data and affiliated research will no longer be available.

In the Walkerton Inquiry Report [Part 2](#), Justice O'Connor concluded the privatization of laboratory testing of drinking water samples connected directly to the *E. coli* O157:H7 outbreak in Walkerton Ontario in May 2000. Twenty-four years later, there is a proposal to privatize water testing once again.

At the March 22nd, 2024 meeting of the Thames-Sydenham Source Protection Committee the following resolution was unanimously approved:

Recommendation

THAT the SPC direct staff to write a letter requesting that the province does not proceed with the recommended phase out of free private well water testing in Ontario or to close 6 water testing sites within our region.

Moved by Earl Morwood -seconded by Jarrod Craven

“RESOLVED THAT the SPC direct staff to write a letter to the Minister of the Environment, Conservation, and Parks, Minister of Health and General Auditor requesting that the province does not proceed with the recommended phase out of free private well water testing in Ontario or close water testing sites.”

CARRIED.

Thank you for your consideration of this request.

Sincerely,

A handwritten signature in black ink, appearing to read 'Julie Welker', with a stylized flourish at the end.

Julie Welker
Thames-Sydenham Source Protection Region
Source Protection Coordinator

CC: Thames-Sydenham Source Protection Committee
Honourable Sylvia Jones, Ontario Minister of Health and Long-Term Care
Honourable Andrea Khanjin, Ontario Minister of Environment, Conservation and Parks
Honourable Shelly Spence, Auditor General of Ontario