



Professional Geoscientists Ontario (PGO)  
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November 15, 2019

Ministry of the Environment, Conservation and Parks (MECP)  
Environmental Policy Branch  
40 St Clair Avenue West  
Floor 10  
Toronto, ON  
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Attention: Naomi Herold - Senior Policy Analyst  
[waterpolicy@ontario.ca](mailto:waterpolicy@ontario.ca)

**Subject: Proposed Amendments to the Wells Regulation – Env. Registry # 013-1513**

The Professional Geoscientists Ontario (PGO) was established to protect the public and the natural environment by regulating geoscience practice in Ontario. This mandate is our top priority and we appreciate the opportunity to provide input on the above-noted proposal. In the past, the PGO has been pleased to work with the Ministry of Environment, Conservation and Parks on a number of policy areas and topics including brownfields, excess soil, water-taking permits, water resources protection, and others.

With respect to the proposed amendments for the Wells Regulation (R.R.O. 1990, Regulation 903 under the Ontario Water Resources Act), PGO is supportive of the changes aimed at reducing administrative burden on the well construction industry, while maintaining protections for the environment, human health and public safety, and consumers. We appreciate the MECP's efforts to improve the Wells Regulation. To that end, we have some additional suggestions that could be made to enhance the overall effectiveness of the amendments. These suggestions are outlined on Attachment 'A'.

PGO looks forward to our continued relationship and kindly requests the opportunity to provide further input as the regulatory amendments evolve.

Sincerely,

Milan Situm, P.Geo.  
President

Ron Ormson, P.Geo.  
Chair, Environmental Geoscience Subcommittee

cc. Tony Andrews – CEO  
Marilen Miguel – Director, Stakeholder Relations

**Attachment 'A'**  
**Additional suggestions from the Professional Geoscientists of Ontario**  
**November 2019**

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**Suggestion 1 – Use of Qualified Professionals (QPs)**

In our view, the O.Reg. 153/04 provisions concerning QPs have been very effective and have served to protect the public by ensuring that only those professionals with the appropriate education and experience provide key opinions and decisions concerning Brownfields. As a result, we see a similar opportunity under O. Reg. 903 to recognize that QPs have a role in the protection of public health and are suited to perform specialized duties beyond the basic tasks already permitted for certain classes of well technicians. We would value the opportunity to provide more feedback to the MECP on this.

**Suggestion 2 – Groundwater Under the Direct Influence of Surface Water (GUDI) Legislation**

The PGO's members are involved in the current provincial initiative to revise Ontario guidance under the *Safe Drinking Water Act* (SDWA) "TECHNICAL SUPPORT DOCUMENT: Determination of Minimum Treatment for Municipal Residential Drinking Water Systems Using Subsurface Raw Water Supplies". Chapter three of this SDWA draft guidance document addresses supply well construction. We see an opportunity for the province to review and harmonize the well construction requirements of the *Safe Drinking Water Act* and the *Ontario Water Resources Act*- specifically the guidance documents and regulations relating to well construction. Clarifying the well construction guidance (for wells at risk of contamination from pathogens) will result in greater protection for the public.