



Tay Valley Township

Hon Chris Ballard
Minister of Housing
17th Floor, 777 Bay Street
Toronto, Ontario M5G 2E5

December 20, 2016

Re: Proposed Ontario Building Code Change B-08-09-03
Mandatory 5 Year Septic Inspections

Dear Mr Ballard,

I am writing to you to express strong opposition to Proposed Ontario Building Code Change B-08-09-03 which would require septic systems to be inspected every five years. The Township agrees that inspecting septic systems and regular pumping maintenance are reasonable and desirable goals. In fact the Township has a mandatory septic inspection program for cottage properties on seven of its lakes whose Lake Association members have requested this program.

However, Tay Valley Township Council is concerned that 5 years is an arbitrary target. There is also concern that a simple pump out does not address maintenance issues. Five year pump outs will simply result in moving sewage from one location to another. The alternative of testing the tanks and judging the level of sludge present would result in a more evidence based approach reflecting actual conditions. It should include inspection of the septic system components (e.g., filters and baffles) which would address nutrient management, therefore, the longevity of the system would increase as the leaching field would be maintained.

Tay Valley Township Council has many questions about implementation:

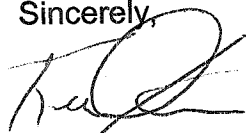
- Where will the septage be taken for disposal?
- Where is there capacity for disposal?
- Will Tay Valley Township have to create capacity?
- Has the Ministry of Housing or Ministry of Environment and Climate Change done a capacity analysis for septage treatment by some type of catchment area, e.g. Lanark County or other smaller area?

- Who will bear the costs? There are cost implications for residents. What happens when people can't afford the pump out? Will grants or loans be available?
- Will infrastructure funding from the province for package plants (communal septic systems)?

There are also cost implications for municipalities and/ or the septic office or Public Health Unit to verify pumping is occurring. Unless MAH creates an app for verification by the pumpers to send to the Townships, the Mississippi Rideau Septic System Office estimates it will require at least ½ a Full Time Equivalent position to monitor the paperwork and track or enforce compliance. Money spent on tracking compliance would be better spent as a no-interest loan to replace septic tanks or pay for the pump out.

In summary, the Township is opposed to mandatory septic pump outs on a 5 year arbitrary time frame rather than an evidence based approach through testing sludge levels. The Township is further opposed to mandatory septic pump outs until a more comprehensive implementation strategy has been identified by the province and agreed to by the Township.

Sincerely,



Keith Kerr
Reeve

cc Randy Hillier, MPP, Lanark-Frontenac-Lennox & Addington

Hon. Glen R. Murray, Minister of the Environment and Climate Change