



November 20, 2025

Caspar Hall
Assistant Deputy Minister
Ministry of Municipal Affairs & Housing
Local Government Division
College Park, 777 Bay Street, 13th Floor
Toronto ON M7A 2J3

Dear Mr. Hall:

RE: York Region Staff Response – ERO 025-1098 – Proposed legislative amendments to transition Peel Region water and wastewater to local municipalities under a Water and Wastewater Public Corporation

Thank you for the opportunity to comment on *Proposed amendments to the Municipal Act, 2001 to transfer jurisdiction over water and wastewater to the lower-tier municipalities in Peel Region and a standalone statute to authorize the establishment of Water and Wastewater Public Corporations*. York Region has a direct stake in the Peel system and staff request the Province act on recommendations included in this response when developing the regulations and frameworks that will underpin the Peel Region water and wastewater transition.

Regulations must guarantee York Region water and wastewater capacity to avoid interruptions in servicing and enable future housing

The Province and York Region share the goals of accelerating housing delivery and maintaining servicing for residents. Ensuring consistent water and wastewater servicing availability now and in the future is essential to achieve these goals. York Region does not border Lake Ontario and relies on long-established municipal partnerships to provide the volume of drinking water required to service more than 1.29 million residents and support growth.

York Region initially partnered with Peel Region to provide wastewater servicing and water supply through agreements in 1998 and 2001, respectively and has worked collaboratively with Peel Region since that time. York Region's water and wastewater system has been built out based on these bulk servicing supply agreements providing servicing security and consistent water rates for residents. Long-term certainty on these supply agreements is required to sustain drinking water services for existing York Region residents and businesses that is critical to unlocking housing and economic growth in York Region. It is strongly recommended that the regulations guarantee water and wastewater supply to York Region within the terms and conditions under these existing in-perpetuity agreements, with service provision to York Region at levels required to maintain and support continued growth.

Regulations need to transfer existing supply agreements and provincial permits to the new Water and Wastewater Public Corporation

For the reasons outlined above, ensuring continuity in service must be a critical focus of the transition regulations. York Region's partnership supply agreements with the Region of Peel are structured to continue in perpetuity, including any successors. It is recommended that regulations include a clause transferring existing water and wastewater-related agreements with York Region to the new Water and Wastewater Public Corporation (WWPC). The transfer or assignment of these agreements should only make the necessary administrative amendments required (e.g. entity name change). Substantive aspects of the agreement, including service levels and rates should continue unchanged to maintain continuity in service.

York Region is also included on Peel Region permits issued by the Ministry of the Environment, Conservation and Parks that must be maintained to ensure continuity in service. While Permits to Take Water (PTTWs) and other permits often include standard language indicating that they are non-transferrable, this situation is beyond what was contemplated under these permits. It is recommended that the regulations include provisions to automatically transfer Provincial permits to the new Public Corporation, based on the information below.

Current Peel Region Permits to Take Water (PTTW) need to be transferred to the Public Corporation to maintain York Region's approved intra-basin transfer

York Region completed the Prior Notice and Consultation Process under the Great Lakes Charter, receiving notice of successful completion of the Intra-Basin Transfer (IBT) process in 2010 and secured bi-lateral agreement among Ontario, Quebec and eight Great Lakes states. This enabled intra-basin transfer of drinking water from Lake Ontario into the Lake Huron watershed, with return flow to Lake Ontario, up to a maximum transfer of 105ML/D. Successful completion of the process allowed York Region's IBT volumes to be added to City of Toronto and Peel Region PTTWs as a "related transferor", in accordance with requirements of the *Ontario Water Resources Act*. This IBT permit is a critical requirement for the North York Durham Sewage System expansion to proceed, as the Province has mandated under the *Supporting Growth and Housing in Durham Regions Act, 2022*. Given this Provincial mandate and the need to ensure continuity of service, it is strongly recommended regulations include a provision to transfer the Peel Region PTTWs to the new Public Corporation.

With \$1 billion invested in cost-shared capital assets in Peel Region and \$190 million in debt obligations, York Region needs to be involved in asset and services decisions

Agreements between York and Peel Regions go beyond simply providing fee-based bulk water supply and wastewater treatment. York Region has invested nearly \$1 billion in Peel Region cost-shared water and wastewater infrastructure to ensure York Region's ongoing access to the Lake Ontario water supplies required to support growth and housing. York Region has made significant financial contributions to cost-shared infrastructure located in Peel Region and to dedicated York Region reserve funds, with outstanding debt obligations of \$190M. Although

ATTACHMENT 1

Peel Region's water and wastewater assets will be transferred to a new Public Corporation, the associated debt obligations will remain with both Peel and York Regions.

York Region currently holds a net balance of over \$160 million in a Peel-held asset management reserve designated for future York Region asset management requirements. York Region continues to make significant investments in water and wastewater infrastructure to service the Region, in Peel Region, and City of Toronto that services York Region residents. A map has been included at the end of this response demonstrating the scale of York Region's recent investments in the broader water and wastewater network servicing its residents.

Given this significant investment, debt responsibility, infrastructure ownership status, and ongoing need to maintain services to support existing residents and new growth, York Region requires a meaningful role in decisions involving these assets, reserves and services. This role should include corporate governance, operations, asset maintenance of the Public Corporation, akin to the engagement required for Caledon, Brampton and Mississauga due to the contributions made by York Region to this cost-shared water and wastewater infrastructure network. It is recommended that the Province consult with the Region during the transition and that the regulations formally recognize York Region's long standing interests and investments in transitioning to the new Public Corporation.

York Region has a significant stake that warrants direct representation during the transition process and in transition regulation development

With \$1 billion invested in Peel Region capital assets and \$190 million in current debt obligations, York Region needs a direct role in any transition boards or processes that will direct and administer the shift to a Water and Wastewater Public Corporation model in Peel Region. York Region staff request that the Ministry of Municipal Affairs and Housing and the Ministry of the Environment, Conservation and Parks directly engage York Region when making decisions and developing the transition regulations. It is requested that York Region's interests, agreements, reserves, and permits be formally recognized under the regulation, along with direct representation on any transition board or process that may be developed via these regulations. This will help to ensure effective continuity of service, planning and delivering more homes faster.

Regional Council engagement on this response was not possible ahead of the comment deadline. This response will be reviewed at the December 4, 2025, York Region Committee of the Whole meeting, and as such, it is requested that the Province consider any supplementary comments provided by Regional Council as part of York Region's official response.

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If there are questions regarding these comments or to engage Region staff on the regulations, please contact me directly at Laura.McDowell@york.ca.

Sincerely,

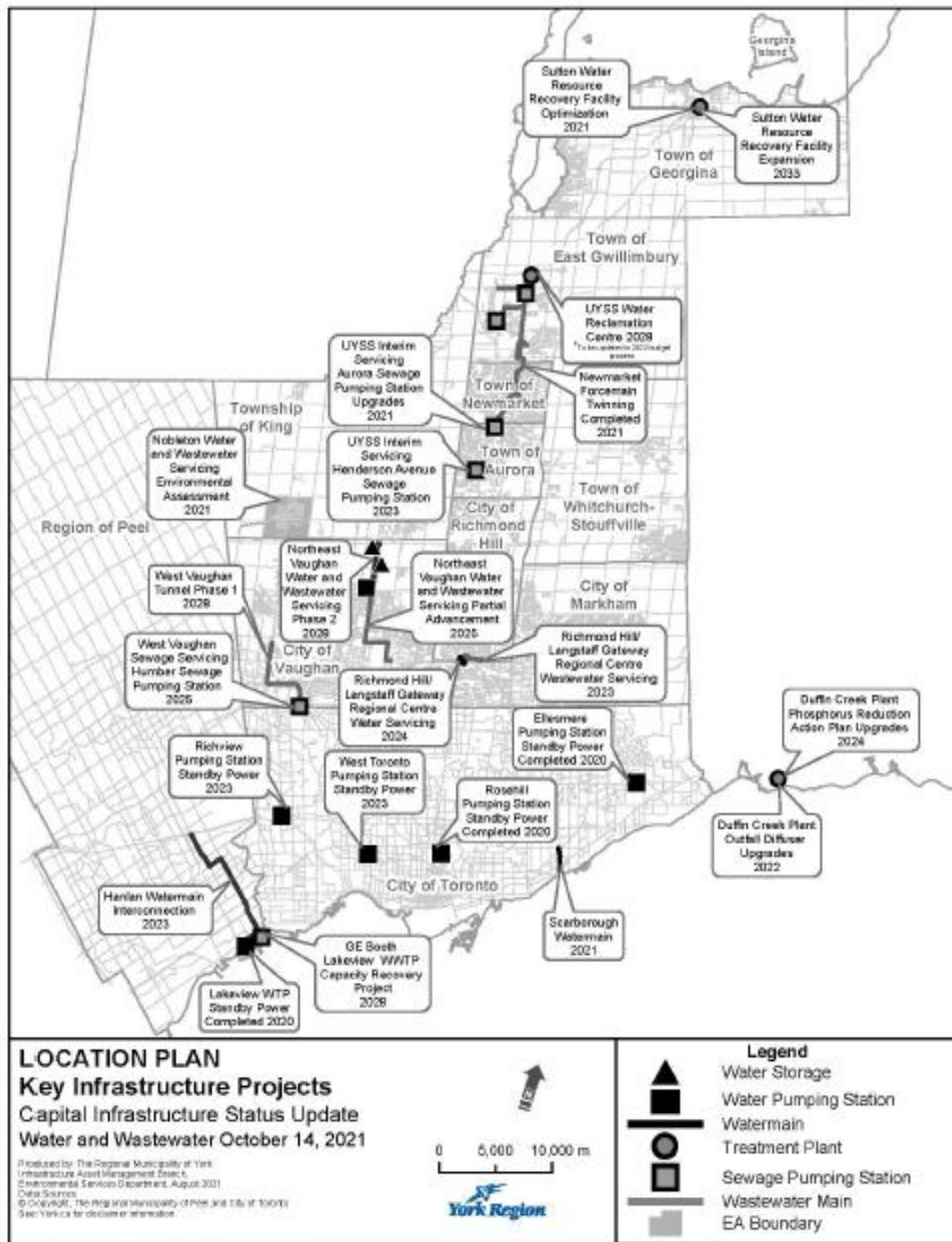


Laura McDowell, P. Eng.
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The Regional Municipality of York

cc Erin Mahoney, Chief Administrative Officer, York Region
Mike Rabeau, General Manager, Capital Infrastructure Services, Public Works, York Region
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Recent York Region investments in the broader water and wastewater infrastructure network



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