

May 6, 2026

Local Government Policy Branch
777 Bay St., 13th Floor
Toronto, ON
M7A 2J3

Submitted via website, Localgov@ontario.ca and irpb-mmah@ontario.ca

To whom it may concern,

Re: Bill 98 – Schedule 6: Municipal Act, ERO 026-0301: Proposed amendments to the Water and Wastewater Public Corporations Act, 2025 and consequential amendment to the Safe Drinking Water Act, 2002, and ERO 026-0302: Communal drinking water and wastewater system municipal consent requirements

OFA appreciates this opportunity to contribute to the consultation on Bill 98 – Schedule 6: Municipal Act; ERO 026-0301: Proposed amendments to the Water and Wastewater Public Corporations Act, 2025 and consequential amendment to the Safe Drinking Water Act, 2002, and ERO 026-0302: Communal drinking water and wastewater system municipal consent requirements.

OFA strongly supports the explicit prohibition of private ownership in any new water and wastewater public corporation.

This Bill and consultation outline the regulation-making authorities under the Act. While a proponent is required to apply for municipal consent to establish a non-municipal communal drinking water or wastewater system (public utility), future regulations can compel the municipality to approve any application that meets provincially prescribed criteria and conditions. These criteria and conditions include establishing regulations:

(iv) prescribing criteria or conditions with respect to where the public utility may be located and with respect to the lands on which the public utility may be located,

(v) prescribing zoning by-law requirements in respect of the lands on which the public utility is located and in respect of the lands that the public utility will be used to service.

OFA is opposed to the removal of a municipality's discretion to deny a permit. Furthermore, we request that that the development of these regulations respect the need to preserve Ontario's farmland for agricultural purposes, agricultural operations and agricultural systems.

The Ontario Federation of Agriculture (OFA) is dedicated to ensuring that the agri-food sector and rural communities are considered and consulted with on issues, legislation and regulations that would impact the sustainability and growth of our farm businesses. Ontario's agri-food sector is an economic powerhouse – producing more than 200 farm and food products, fuelling rural communities, generating over 860,000 jobs, and contributing over \$51.43 billion to Ontario's annual GDP. The province's agri-food strategy, Grow Ontario, aims to strengthen the agri-food sector, support economic growth, and ensure an efficient, reliable and responsible food supply.

OFA appreciates the opportunity to provide our feedback and perspectives on Bill 98 – Schedule 6: Municipal Act, ERO 026-0301: Proposed amendments to the Water and Wastewater Public Corporations Act, 2025 and ERO 026-0302: Communal drinking water and wastewater system municipal consent requirements and consequential amendment to the Safe Drinking Water Act, 2002. We look forward to continuing working with the government as this process continues.

Sincerely,



Drew Spoelstra
President

cc: Honourable Trevor Jones, Minister of Agriculture, Food and Agribusiness
Honourable Rob Flack, Minister of Municipal Affairs and Housing
OFA Board of Directors

This submission has been approved by OFA Board of Directors and will be posted to OFA's website: <https://ofa.on.ca/resources>.