



December 20, 2016

Re: FOCA input to the first consultation phase for changes being considered to the Ontario Building Code, Ministry of Municipal Affairs

To Whom it May Concern,

The Federation of Ontario Cottagers' Associations (FOCA) respectfully provides the following recommendations in regard to this consultation.

FOCA is an incorporated non-profit organization that represents over 500 waterfront property owners' groups, with over 50,000 member families. For over 50 years, FOCA has spoken on behalf of, and supported, Ontario's 250,000 waterfront property owners – the vast majority of whom utilize onsite wastewater systems.

Onsite wastewater treatment is important rural infrastructure that requires ongoing maintenance, and a framework to support its ongoing functioning.

The current Ontario Building Code, while providing a sound basis for design and construction of this infrastructure, lacks the clarity and support for ongoing maintenance and inspection activities to verify that all systems continue to function and perform in the intended manner. This is necessary to protect the environment, public health and private real estate values.

Responsibility for the effective management of all onsite systems resides with the owners of these systems, and this should be supported through education and policy. FOCA has been an active communicator of BMP's and related septic system information for many years.

Maintenance activities may help ensure compliance with the existing Building Code requirements, and address some missing aspects related to the ongoing performance of onsite systems.

We believe that by requiring measurement of septic tank solids at regular intervals within the existing Operation & Maintenance Section 8.9 of the Building Code, it would ensure all systems can be verified on an ongoing basis, and that owners are aware of this routine maintenance check.

Requiring that records of maintenance activities be retained by the system owner for submission "upon request" of the Chief Building Official provides both a platform to communicate the value of doing maintenance for ongoing system function, and direction on how to comply with the maintenance requirements.

This proposed code change would enable a more proactive approach to onsite wastewater system management.

With this in mind and with respect to PROPOSED CHANGE NUMBER: B-08-09-03 we concur with this specific change:

8.9.3.4. Class 4 Sewage Systems

(2) The records of septic tanks and treatment units cleaning as required by Sentences (1) shall be kept by the operator of the sewage system for submission to the chief building official upon request.

The requirements for such septic tank maintenance measurements for all systems will work alongside existing re-inspection programs. It will ensure that more system owners have already located and accessed their septic tank, and likely will have conducted any repairs or upgrades prior to any municipal inspection. Records from the owner's maintenance activities can be used to inform inspection programs, reducing the burden on municipal programs for gathering this information anew.

This is an an important opportunity to strengthen the existing Building Code sections on septic tank maintenance, without forcing the unnecessary pumping of tanks and related septage disposal problems for rural communities already challenged to adequately handle and treat these materials.

We look forward to the thoughtful consideration and use of these comments.

Respectfully,

A handwritten signature in black ink, appearing to read "Terry Rees". The signature is fluid and cursive, with the first name "Terry" being larger and more prominent than the last name "Rees".

Terry Rees, Executive Director
on behalf of Federation of Ontario Cottagers' Associations, Inc.

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